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ABSTRACT

Current and proposed standards for satisfactory academic progress for recipients of federally sponsored student financial aid under Higher Education Act Title IV are reviewed. The review covers the following standards, proposals, and guidelines: the Veterans Administration standard, a self-regulatory initiative and guidelines for colleges provided by the American Council on Education (ACE) and others; a National Association of Student Financial Aid (NASFA) monograph that explains the self-regulation guidelines; proposed regulations for Title IV issued by the U.S. Department of Education that would incorporate the standards of the ACE statement; a General Accounting Office report that is critical of the institutions' academic progress standards and that offers policy recommendations; and the Pell-Nickles Bill to amend Title IV to provide academic progress standards. This overall review also includes a survey of student financial aid officers, which indicates the actions being undertaken by postsecondary institutions in light of the self-regulatory initiative. Eight recommendations are offered, and appendices include sample institutional policies, the text of the Pell-Nickles Bill, a satisfactory progress checklist, the ACE statement, and the NASFA monograph. (SW)

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National Commission on Student Financial Assistance

SATISFACTORY ACADEMIC PROGRESS STANDARDS

FOR FEDERAL STUDENT AID RECIPIENTS

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Scott E. Miller, Senior Research Associate

HE 016 126

NATIONAL COMMISSION ON STUDENT FINANCIAL ASSISTANCE

The National Commission on Student Financial Assistance was created by Public Law 96-374, the Education Amendments of 1980. During the congressional deliberations on those amendments, the Congress realized there was a general lack of reliable information and well-informed policy recommendations on many of the most fundamental and important federal student assistance policy issues in postsecondary education. The National Commission was established to correct this situation and to serve as a reliable policy agent for the President and the Congress.

Established in 1981, the National Commission is a bipartisan panel of members of Congress, leaders in the higher education community and representatives of the public. The panel is composed of twelve members, four appointed by the President of the United States, four by the House of Representatives and four by the United States Senate.

The final report of the National Commission is due on July 1, 1983.

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EXECUTIVE SUMMARY

BACKGROUND

As part of its legislative charge, the National Commission on Student Financial Assistance has been directed to examine the issue of satisfactory academic progress standards for recipients of federally sponsored Title IV student financial aid. This issue has been a source of controversy within the academic community for a number of years; a controversy that has intensified in recent months.

Specifically, the National Commission on Student Financial Assistance was asked to:

> conduct a study to determine if student eligibility for financial assistance . . . on the basis of maintaining satisfactory academic progress should include provisions which would require that a student complete successfully a specified portion of the workload undertaken during the academic period for which assistance was received by the student.

RESEARCH

In fulfilling this charge, the Commission's Subcommittee on Satisfactory Academic Progress reviewed recent developments in the higher education community that have been initiated as a result of the controversy surrounding this issue. Among the more positive devlopments has been a self-regulatory initiative undertaken by the American Council on Education and others that has culminated in the issuance of a set of guidelines to be

used by postsecondary institutions in designing their standards of academic progress. Also, the results of a survey of student financial aid officers indicates that a majority of postsecondary institutions are actively reviewing their progress standards for aid recipients in light of the self-regulatory initiative. One outgrowth of the self-regulatory initiative has been the publication of a Notice of Proposed Rulemaking by the U.S. Department of Education that would incorporate the principles included in the community standards into the regulations governing the federal student assistance programs.

RECOMMENDATIONS

The National Commission on Student Financial Assistance has identified two major areas of concern in regard to the establishment and enforcement of satisfactory academic progress standards for student aid recipients. First, there has been no systematic effort to assess the standards currently employed by postsecondary institutions and, second, the enforcement of these standards is not being sufficently monitored. In order to remedy these deficiencies, the National Commission on Student Financial Assistance recommends the following:

- o ADOPT THE U.S. DEPARTMENT OF EDUCATION'S NOTICE OF PROPOSED RULEMAKING ON SATISFACTORY ACADEMIC PROGRESS (MAY 4, 1982), WHICH INCORPORATES THE POSTSECONDARY EDUCATION COMMUNITY'S SELF-REGULATORY INITIATIVE AND SETS FORTH SPECIFIC ELEMENTS TO BE INCLUDED IN INSTITUTIONAL SATISFACTORY PROGRESS STANDARDS FOR STUDENT AID RECIPIENTS.

- REQUIRE ALL TITLE IV ELIGIBLE INSTITUTIONS TO SUBMIT A COPY OF THEIR SATISFACTORY ACADEMIC PROGRESS STANDARDS TO THE U.S. DEPARTMENT OF EDUCATION AS PART OF A ONE-TIME EFFORT TO ASSEMBLE THESE STANDARDS.

- INSTRUCT THE U.S. DEPARTMENT OF EDUCATION, IN COOPERATION WITH CONGRESS AND THE HIGHER EDUCATION COMMUNITY, TO EVALUATE THESE PROGRESS STANDARDS TO DETERMINE THEIR COMPATIBILITY WITH THE DEPARTMENT'S PROPOSED RULE (May 4, 1982). THIS REPORT WILL BE DELIVERED TO CONGRESS WITHIN SIX MONTHS AFTER THE STANDARDS ARE COLLECTED.

- REQUIRE THE U.S. DEPARTMENT OF EDUCATION TO COLLECT AND REVIEW THE STANDARDS OF ACADEMIC PROGRESS DEVELOPED BY INSTITUTIONS THAT APPLY FOR TITLE IV ELIGIBILITY TO ENSURE THAT THESE STANDARDS MEET THE SPECIFICATIONS OF THE DEPARTMENT'S PROPOSED REGULATIONS.

- REQUIRE POSTSECONDARY EDUCATION INSTITUTIONS TO SUBMIT TO THE U.S. DEPARTMENT OF EDUCATION ANY REVISIONS IN THEIR SATISFACTORY ACADEMIC PROGRESS POLICIES FOR AID RECIPIENTS, AND REQUIRE THE DEPARTMENT TO REVIEW ANY SUCH CHANGES TO ENSURE THAT THEY ARE CONSISTENT WITH THE STANDARDS INCLUDED IN THE NOTICE OF PROPOSED RULEMAKING (MAY 4, 1982).

- INSTRUCT THE U.S. DEPARTMENT OF EDUCATION TO REQUIRE THAT THE MAINTENANCE AND ENFORCEMENT OF PROGRESS STANDARDS BE EXAMINED MORE CAREFULLY THAN AT PRESENT DURING ANNUAL AND PROGRAM REVIEW AUDITS OF POSTSECONDARY INSTITUTIONS.

- REQUIRE POSTSECONDARY INSTITUTIONS TO INCLUDE A STATEMENT OR SUMMARY OF THEIR ACADEMIC PROGRESS REQUIREMENTS WITH THE AID-AWARD LETTERS THEY SEND TO STUDENT AID RECIPIENTS.

- URGE THE U.S. DEPARTMENT OF EDUCATION TO CONTINUE ITS COOPERATIVE EFFORTS WITH THE HIGHER EDUCATION COMMUNITY AND POSTSECONDARY INSTITUTIONS ON SATISFACTORY ACADEMIC PROGRESS AND TO INCLUDE NATIONALLY RECOGNIZED ACCREDITING ASSOCIATIONS AND AGENCIES IN THIS EFFORT.

The National Commission on Student Financial Assistance believes that these recommendations will lead to greater adherence to the Title IV requirements for the maintenance of satisfactory academic progress by student aid recipients. The Commission also believes that the recommendations strike a balance between the community's desire for institutional autonomy and the need for the federal government to ensure that its student assistance dollars are being spent in accordance with the law.

The Commission wishes to stress that these recommendations are interrelated, and must be considered as a package. The recommendations complement each other and cannot be adopted separately.

I. INTRODUCTION

COMMISSION CHARGE

As part of its legislative charge, the National Commission on Student Financial Assistance has been directed to examine the issue of satisfactory academic progress standards for recipients of federally sponsored student financial aid. This issue has been a source of controversy within the academic community for a number of years; a controversy that has intensified in recent months.

Specifically, the National Commission on Student Financial Assistance was asked to:

> conduct a study to determine if student eligibility for financial assistance . . . on the basis of maintaining satisfactory academic progress should include provisions which would require that a student complete successfully a specified portion of the workload undertaken during the academic period for which assistance was received by the student.[1]

BACKGROUND

This portion of the Commission's legislative mandate was included in response to initiatives by members of the administration of President Jimmy Carter and the United States Senate. In 1979, as part of the hearings on the pending 1980

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[1]Public Law 96-374, Sections 491-5.

Reauthorization of the Higher Education Act, Dr. Mary Berry, Assistant Secretary for Education of the Department of Health, Education and Welfare, testified before the Senate Education Arts and Humanities Subcommittee recommending that recipients of federal student assistance be required to complete satisfactorily at least 50 percent of the courses they enroll in each semester. Students not meeting this standard would be denied federal assistance in the ensuing semester.

Response to this suggestion was mixed. Senator Claiborne Pell (D-R.I.), chairman of the Senate subcommittee, concluded that such a standard might prove too lenient, allowing students to fail half of their course work. He proposed a 75 percent standard rate of satisfactory completion as a prerequisite for receiving federal student assistance.

Senator Pell's proposal was included in the version of the 1980 Reauthorization of the Higher Education Act that passed the full Senate. The House of Representatives, meanwhile, had included no provision to strengthen academic progress requirements in its version of the Reauthorization bill. During the meeting of the conference committee on the Reauthorization Bill, the issue was dropped from the Senate bill and, instead, was referred to the National Commission on Student Financial Assistance for study.

Since the time of the 1980 Education Amendments the issue of satisfactory progress standards for aid recipients has generated wide-ranging debate within the academic community.

For this reason, the Satisfactory Academic Progress Subcommittee of the National Commission on Student Financial Assistance has chosen not to confine itself to the narrow legislative charge, but, rather, to review the current situation regarding satisfactory academic progress standards and to consider options for maintaining, revising or substituting for the present system.

SATISFACTORY ACADEMIC PROGRESS STANDARDS

Currently there are specific standards that postsecondary institutions must conform to in developing satisfactory progress standards for recipients of Title IV aid.* Section 497(e) of the Higher Education Act of 1965, as amended, states that a recipient of Title IV assistance must be

> maintaining satisfactory progress on the course of study he is pursuing, according to the standards and practices of the institution at which the student is in attendance.[2]

This measure was adopted as part of the Education Amendments of 1976.

In its interpretation of this rule, the Education Department has instructed all Title IV eligible institutions

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*The Title IV program was authorized under the Higher Education Act of 1965, as amended, and included the Pell Grants, Supplemental Educational Opportunity Grants, the National Direct Student Loan program, College Work-study programs, State Supplemental Incentive Grants and the Guaranteed Student Loan program.

[2]20 United States Code, Section 1070, et seq.

that they are required to maintain published standards of satisfactory progress which must be enforced by the institution. The specifics of the standard are to be determined by the institution.

Prior to the Education Amendments of 1976, there was no federal policy regarding standards of academic progress for recipients of Title IV student assistance. With the implementation of this requirement, Congress was expressing its desire to ensure that Title IV assistance be directed to those students who are seriously pursuing an educational goal. At the same time, Congress acknowledged that the responsibility for designing standards of satisfactory progress rested with individual postsecondary institutions. The federal government was not prepared, in 1976, to establish a common standard for all schools.

As previously described, Congress considered the issue of satisfactory progress standards for aid recipients as part of its 1980 Reauthorization of the Higher Education Act. While the Senate was inclined to set a standard rate of course completion for aid recipients, the House of Representatives was unwilling to go along with this proposal. The House preferred to leave the specifics of these standards in the hands of individual postsecondary institutions.

The means for measuring satisfactory academic progress vary from institution to institution. Many schools establish a minimum grade point average that students must achieve in order

to maintain their eligibility for student aid. Others require that students complete a certain percentage of course work each semester or that they can receive aid only for a specified number of academic terms. Attendance requirements, steady progress towards graduation, and minimum grades in a student's major field of study are also used by schools as measures of satisfactory progress.

The majority of postsecondary institutions maintain standards of progress for their general student body. These standards are often similar or identical to those applied specifically to aid recipients. In many cases, the standards for aid recipients are more stringent than those for the general student body. The stringency of the standards employed for aid recipients and nonrecipients may vary according to the goals, missions and academic reputation of the institution. Academic progress standards are also required by numerous accrediting agencies.

Progress standards may also vary for aid recipients depending on the type of aid received. Depending on the policy of the institution, standards may be maintained for federal aid recipients only, institutional aid recipients only, recipients of specific scholarships, or all aid recipients. Again, this is left to the discretion of the institution or to the sponsors of nonfederal sources of student assistance.

The enforcement of progress policies is also inconsistent across institutions. Some schools deny aid to all students who

do not meet the standards of progress. Others may even try to recapture funds issued to these students for academic periods when progress standards were not adhered to. Probationary periods, during which students may attempt to regain "good standing" are commonly employed in enforcing progress standards.

II. CURRENT POLICIES AND PROPOSALS

VETERANS ADMINISTRATION PROGRAMS

The Veterans Administration (VA) provides student financial assistance for thousands of students who have completed military service. As part of its effort to ensure that these funds are spent properly, the VA has established standards of academic progress that must be met by those receiving aid.

In general, the VA standard is more specific than those which govern the receipt of Title IV assistance. The VA standard states that students must be making satisfactory academic progress in accordance with the standards established by the postsecondary institutions they attend. Additionally, the VA has defined the elements that must be included in these institutional standards. Progress standards at institutions eligible for VA assistance must include explanations of:

- o the school's grading system;
- o the minimum satisfactory grade level;
- o conditions for interruption of training due to unsatisfactory grades or progress;
- o any probationary period; and
- o conditions for a student's readmission following dismissal or suspension for unsatisfactory progress.[3]

[3] 38 United States Code, Sections 1674, 1724, 1775, 1776.

The VA requirement further states, that it will provide funds only for courses leading directly to graduation or completion of a specific curriculum. Courses that a student withdraws from, fails to complete, or are not used in computing a final grade point average are not funded by the VA.[4]

In 1976, the VA attempted to stiffen its progress requirements by requiring that students maintain a rate of progress that will lead them to graduation within the specified length of the course of study they were pursuing (for example, four years to achieve a B.A.). Students who fell behind at least one semester in their progress were denied further VA assistance under this rule. Institutions found this rule difficult to administer and the VA found that this was not a fair means for assessing a student's academic progress. According to a report issued by the General Accounting Office in 1981, the "VA found that students making excellent progress otherwise sometimes failed to meet this requirement. Thus, Public Law 96-466, enacted in October 1980, deleted the time requirement in favor of reliance on the schools' own standards of progress."[5]

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[4]38 United States Code, Section 1780.

[5]U.S. General Accounting Office, Students Receiving Federal Aid Are Not Making Satisfactory Progress: Tougher Standards Are Needed, HRD-82-15 (Washington, D.C.: U.S. Government Accounting Office, December 3, 1981), p. 4.

The Veterans Administration delegates enforcement of its progress standards to state accrediting agencies that are responsible for certifying VA approved courses of study. These state offices conduct periodic site reviews in cooperation with regional offices of the Veterans Administration.

SELF-REGULATORY INITIATIVE

In response to the debate during the 1980 Reauthorization of the Higher Education Act on satisfactory progress standards for aid recipients, the higher education community initiated an effort to develop its own standards of progress. It was the belief of many persons on campuses across the nation that institutions were the proper entities to charge with the development of progress standards. Some members of the education community argued that federal attempts to dictate a national standard of progress were an intrusion on the academic freedom and autonomy of postsecondary institutions.

In the fall of 1980, the Advisory Committee on Self-Regulation of the American Council on Education (ACE) launched an effort to develop institutional guidelines for standards of academic progress. It was believed, at that time, that if the academic community could take the lead in this matter there would be no need for federal intervention. With the American Association of College Registrars and Admissions Officers (AACRAO) and the National Association of Student Financial Aid Administrators (NASFAA) taking the lead in this effort, ACE

engaged other national associations and the Education Department to assist in developing progress standards.

The culmination of this self-regulatory initiative was the publication in December 1981 of a "Joint Statement on Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility" (Appendix A). These guidelines, which have been endorsed by nearly all of the groups representing postsecondary institutions and personnel, provide a framework for the institutional development of a progress standard. The recommendations included in the self-regulation initiative are presented in five parts:

o Institutions should take all necessary steps to fulfill federal requirements to implement progress standards and should make every effort to publicize these guidelines. Every federal aid recipient should receive a copy of the progress standards.

o Progress standards should reflect the diversity of an institution's students and academic programs. Within given categories of students or programs, the standards should be uniformly applied to all federal aid recipients.

o Consistent with the goals of the institution and its academic programs, the institution should establish reasonable lengths of time for completion of courses of study. Included in this standard should be clear statements of the effect of course withdrawals, incomplete grades, course repetitions, and noncredit courses on the evaluation of a student's academic progress.

o Institutional policy should clearly describe the procedures for appeal and reinstatement of students. In order to properly conduct review or appeal proceedings, the institution should maintain all documentation pertaining to actions taken regarding students' noncompliance with progress standards.

o Institutions should review the progress of aid recipients at least once per year, preferably before the beginning of the financial aid award period.[6]

This initiative has been enthusiastically endorsed by the higher education community. In testimony before the House of Representatives Postsecondary Education Subcommittee of the Education and Labor Committee, Dallas Martin, executive director of the National Association of Student Financial Aid Administrators reported:

> During the development of the [ACE] statement, personnel in the Department of Education were invited to provide reactions to the effort. Finalization of the statement brought about complete agreement from the higher education community and the Department as to not only the worthwhile nature of the effort, but as to the content and comprehensiveness of the statement. We have been assured by Department personnel of their desire to support the community's initiative and of their intent to limit their involvement in this issue.[7]

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[6]American Council on Education, "Joint Statement on Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility," Self-Regulation Initiatives, no. 5 (Washington, D.C.: American Council on Education, December 1981), pp. 1-2 (Appendix A).

[7]U.S. Congress, House, Committee on Education and Labor, Subcommittee on Postsecondary Education Hearings, Oversight on Current Status of Federal Student Assistance Programs, 97th Cong., 2d sess., p. 298.

This last statement of Mr. Martin sums up both the impetus for the self-regulatory effort and the reaction to its completion. The higher education community has joined together in an attempt to forestall the development of a specific federal standard of academic progress for aid recipients.

Testifying at this same hearing, Dr. Jack Peltason, president of the American Council on Education, presented his view of the value of the self-regulatory initiative:

> These actions represent a voluntary community response to problems that we have recognized in this area. In this instance, I believe that we have been able to move forward effectively to correct problems that have come to light, yet in a manner that supports local institutional autonomy to the greatest degree possible.[8]

In response to questioning from Rep. Paul Simon (D-Ill.), chairman of the subcommittee, Dr. Peltason elaborated on the problems that might be associated with a strict federal rule on academic progress. He contended that a federal requirement would be too inflexible and would not be adaptable to the individual needs of postsecondary institutions and students. He went on to indicate that there is a need for "some human being to apply some discretion to take care of the case where there is not abuse," but where special circumstances have resulted in a student not complying with the letter of the law.[9]

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[8]Ibid., p. 78.

[9]Ibid., p. 65.

NASFAA MONOGRAPH

In order to assist institutions in applying the principles outlined in the self-regulatory guideline, in April 1982 the National Association of Student Financial Aid Administrators published a comprehensive monograph on the subject, Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility--A Self-Regulation Initiative (Appendix B). This monograph provides an in-depth explanation of the self-regulation guidelines and includes procedures that institutions may follow in reviewing and establishing academic progress standards for student aid recipients.

Among other recommendations, the monograph advocates the establishment of a specific panel or committee comprised of representatives from a variety of institutional departments for the purpose of reviewing or establishing progress standards. Financial aid, admissions and academic officers; faculty members and other campus officials; and students should all be represented on such a panel. In testimony presented to the National Commission on Student Financial Assistance in December 1982, Ms. Mary Gill, assistant director of financial aid at the University of California, Davis, indicated the support of the California Association of Student Financial Aid Administrators for this concept:

> This cross-fertilization of ideas is healthy. This broad representation is necessary if policies are to reflect the mission and goals of the institution. The vital function of monitoring academic progress cannot be the sole responsibility of the financial aid

> office. The current system provides full institutional participation and generates greater support.[10]

The monograph details the various elements of progress guidelines and includes strategies for determining the most appropriate standard for an individual school. Sample policies and student situations are presented in order to illustrate the effects of each policy option, and appeals procedures and reinstatement guidelines are also discussed.

PROPOSED REGULATIONS

The U.S. Department of Education has endorsed the self-regulatory initiative. The Department has published regulations which, if adopted, would incorporate the standards of the ACE Joint Statement into the regulations governing the Title IV programs. The Notice of Proposed Rulemaking represents the belief of the Secretary of Education that:

> this postsecondary education community-based initiative preserves essential institutional discretion in setting specific standards of satisfactory progress while establishing parameters to ensure the integrity of the student financial aid programs.[11]

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[10]National Commission on Student Financial Assistance, Transcript of Proceedings of Governance and Administration Subcommittee Hearing, Anaheim, California, December 14, 1982.

[11]Federal Register, May 4, 1982, vol. 47, no. 86, p. 19288.

The proposed regulations set forth a list of criteria that must be addressed in an institution's satisfactory progress standards and require that an institution's progress policy:

- o conform to those established by its respective accrediting agency;
- o be the same or stricter than the institutions' standards for students who are not receiving aid under a Title IV program; and
- o include the following elements:
  - -- grades, work projects completed or comparable factors which are measurable against a norm;
  - -- a time frame in which the educational objective (that is, degree or certificate) is to be successfully completed;
  - -- consistent application of standards to all students within categories of students, and programs established by the institutions;
  - -- specific policies defining the effect of course incompletes, withdrawals, repetitions, and noncredit remedial courses on satisfactory progress; and
  - -- specific procedures for appeal and for reinstatement.[12]

The Education Department's proposed rule has not been formally adopted as of this date.

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[12]Ibid., p. 19290.

U.S. GENERAL ACCOUNTING OFFICE REPORT

On December 3, 1981, the U.S. General Accounting Office (GAO) released a report that was highly critical of the academic progress standards being maintained by recipients of student financial assistance.[13] The report examined the academic progress of students receiving federal support through Title IV, VA and Social Security programs. GAO concluded, based on a limited study of 20 selected postsecondary institutions, that institutions are not enforcing their own standards, that their standards invite abuse, and that over $1.2 million in Title IV aid may have been overawarded to students not making satisfactory academic progress.

GAO recommended that a specific federal policy on satisfactory academic progress be enacted and that this policy require:

- a reasonable relationship between the minimum proficiency levels or grade point averages required and the requirements for graduation or program completion;
- movement toward graduation or program completion at a reasonable rate;
- limitations on excessive withdrawals, repeated courses, courses for which nonpunitive grades are assigned, and courses that do not count toward graduation or completion of a program; and
- application of the standard on a timely basis.[14]

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[13]U.S. General Accounting Office, Standards of Satisfactory Academic Progress.

[14]Ibid., p. vi.

The higher education community was quite critical of the GAO study. NASFAA, ACE and many associations representing postsecondary institutions argued that GAO had based such stringent recommendations on its review of only a small number (20) of institutions and that these institutions were not representative of the 7,000 postsecondary institutions, nationwide. While the community acknowledged that problems existed in this area, they believed that GAO had overstated the extent and degree of abuse. They also took exception to GAO's call for a federal rule specifying satisfactory progress standards.

Testifying before the House Postsecondary Education Subcommittee, Dr. Douglas Conner, executive director of the American Association of College Registrars and Admissions Officers, responded to the GAO report:

> The self-regulation initiative . . . approved by the American Council on Education provides a framework to accomplish this [GAO] recommendation without the specifics that are included as part of the GAO recommendations. In my view, cooperative voluntary efforts between government and higher education seem to be the most effective way of accomplishing this basic objective.[15]

PELL-NICKLES BILL

In August 1982, Sen. Claiborne Pell (D-R.I.) and Sen. Don Nickles (R-Okla.) introduced a bill "to amend Title IV of the Higher Education Act of 1965 to provide standards for

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[15]U.S. Congress, House, Oversight on Student Assistance Programs, p. 60.

maintaining satisfactory progress as a condition for assistance under that title."[16] This bill, known as the Student Assistance Reform Act, proposed a strict definition of satisfactory progress to be required of all recipients of Title IV student assistance. Under this measure:

> a student is maintaining satisfactory progress if:
>
> > (A) the institution at which the student is in attendance, reviews the progress of the student at the end of each academic year, or its equivalent, as determined by the institution, and
> >
> > (B) the student has a C average or its equivalent, as determined by the institution, for that academic year.

The bill also specifies that a student who does not maintain a C average be placed on probation for one grading period. "If the student does not attain a C average grade during the probationary period," the student forfeits his or her eligibility for Title IV assistance. Eligibility may be reinstated if a student achieves a C average or better for two consecutive semesters.[17]

In his statement accompanying the introduction of this legislation, Senator Pell cited the "glaring irregularities" uncovered by the General Accounting Office as a major impetus for drafting this bill. Senator Pell indicated that failure to monitor adequately the academic progress of federal aid

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[16]U.S. Congress, Senate, Student Assistance Reform Act, S. 2822, 97th Cong., 2d sess., 1982, p. 1.

[17]Ibid., pp. 2-3.

recipients has diluted the value of the federal student assistance programs. Senator Pell stated that he and Senator Nickles were:

> very concerned that the absence of specific academic standards for the receipt of Federal student aid can result in abuse of these important programs, and thus weaken the very valuable assistance they provide students who desire to pursue a postsecondary education but cannot afford it.[18]

Senator Pell, acknowledging the recent efforts of the higher education community and the Department of Education to address this area of concern, said these efforts

> simply do not go far enough. There is a need for a Federal standard that spells out specifically what a student must accomplish in terms of a grade average if he or she is to continue to receive Federal student assistance. The issue in this matter is not one of institutional integrity, or interfering with the operation of institutions of postsecondary education. Rather, it is the question of an agreement which a student makes with the Federal Government when he or she accepts Federal student aid. I contend that the aid should be dependent upon the student's maintaining a satisfactory grade point average, which is the matter directly addressed in this legislation.[19]

Reaction from the higher education community has not been favorable towards the Pell-Nickles proposal. Organizations such as NASFAA, AACRAO, and groups representing postsecondary institutions and students have announced their opposition to the measure. These organizations point to the recent

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[18]U.S. Congress, Senate, Statement of Senators Pell and Nickles Accompanying the Introduction of S. 2822, 97th Cong., 2d sess., 1982, p. 1.

[19]Ibid., p. 2.

self-regulatory effort as evidence that the higher education community is, indeed, viewing this matter seriously and is taking positive steps towards rectifying existing abuses.

In a statement submitted to the National Commission on Student Financial Assistance, Dr. Daniel Aldrich, Jr., chancellor of the University of California, Irvine, argues that sufficient time must be alloted to judge the effectiveness of the self-regulatory initiative.

> I believe that this self-regulation initiative, coupled with the Department of Education regulation, fully responds to problems that have been cited in this area. These standards need time to be implemented and evaluated before Congress takes any precipitous action.
>
> To substitute one single inflexible standard, such as maintaining a "C" average for this balanced and well-developed set of guidelines, would undermine institutional autonomy and create unprecedented Federal intrusion into the educational process.

Chancellor Aldrich goes on to express his concern that the Pell-Nickles bill would be a serious infringement on academic autonomy.

> There is no area more central to an institution of higher education than the right to devise and apply its own grading system to meet the academic needs of its students and its programs. In fact, Sec. 103 of the Department of Education Organization Act, (20 U.S.C. 3403) clearly states this important principle:
>
> No provision of a program administered by the Secretary or by any other officer of the Department shall be construed to authorize the Secretary or any such officer to exercise any direction, supervision, or control over the curriculum, program of instruction, administration or personnel of any education institution . . .[20]

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[20]Daniel Aldrich to Commissioner David Irwin, December 20, 1982, Satisfactory Academic Progress Subcommittee file, National Commission on Student Financial Assistance.

Chancellor Aldrich's views are also supported by the National Association of State Universities and Land Grant Colleges.

The Southern Association of Student Financial Aid Administrators (SASFAA) offered the following view of the Pell-Nickles proposal:

> The C average proposition causes certain problems. For example:
>
> (1) A C average would be meaningless for most graduate schools, where a B is the minimum passing grade.
>
> (2) While a C average in schools with highly competitive admissions standards may not be a problem for many of its students, it could have a devastating effect on public institutions, many of whom are obligated by the Office of Civil Rights to enroll and retain minority students in compliance with state plans for equal opportunity in state supported institutions of higher education. These are often the most needy students.
>
> (3) For schools with an open door admissions policy, a C average could produce a revolving door result. This could conflict with the mission and goal of the school. We believe that any legislation which attempts to define satisfactory academic progress in terms of a single criterion is unrealistic considering the diverse nature of institutions and their student bodies.[21]

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[21]National Commission on Student Financial Assistance, Transcript of Proceedings of Governance and Administration Subcommittee Hearing, Lexington, Kentucky, February 16, 1983.

III. ON-CAMPUS REPORT

CURRENT SITUATION

Postsecondary institutions have the responsibility for developing and maintaining satisfactory academic progress standards for recipients of student financial assistance. The Department of Education monitors these standards through periodic Program Review Audits that examine institutional compliance with Title IV rules. Institutional standards are not reviewed prior to their enactment on a campus. The Department requires that institutions establish a standard before they can be eligible to distribute Title IV assistance.

As previously noted, the Department of Education has proposed a new regulation detailing the general specifications of institutional academic progress standards for student aid recipients. These regulations would formalize the results of the self-regulatory initiative prepared by the higher education community.

NASFAA SURVEY

In an attempt to gain insight into the manner in which institutions have been interpreting their present role in setting progress standards, the National Association of Student Financial Aid Administrators in cooperation with the National Commission on Student Financial Assistance distributed a

detailed questionnaire to the NASFAA membership (Appendix D). Financial aid administrators at 2,439 institutions were surveyed during December 1982, to obtain information on:

- o their current progress standards;
- o the manner in which the standards are publicized;
- o their use of the ACE guidelines or proposed federal regulations in setting standards;
- o the frequency of verifications of academic standing;
- o their appeals and reinstatement procedures; and
- o the existence of different policies for certain categories of students.

NASFAA received 704 responses to its survey. While the ability to draw statistically reliable conclusions from the survey is limited by the low response rate, there are a number of trends that are evident from an overview of the data collected.

Over 97 percent of those responding to the survey reported that their institutions maintained satisfactory progress standards for financial aid recipients. Progress standards for aid recipients are commonly published in general campus catalogues or bulletins, financial aid information materials and award letters. The manner of disseminating information on this policy varies from campus to campus.

The majority of respondents first implemented progress standards for aid recipients during the 1970s. This timing suggests a relationship between the establishment of standards

and the expansion of Title IV assistance. Additionally, the federal requirement that a progress standard be applied to recipients was adopted in 1976. Over one-third of the responding institutions indicated that they planned to modify their progress standards. The vast majority of these institutions expected to enact new standards during the 1982-1983 or 1983-1984 academic years.

Nearly all of the respondents reported that they used the NASFAA monograph and/or the higher education community guidelines on satisfactory progress as a tool in reviewing their own standards. The proposed federal regulations, which are based on the community guidelines, were consulted by approximately two-thirds of those responding to the survey.

Over 80 percent of the institutions responding to the survey verify academic standing two or more times during the academic year. Eleven percent of the schools verify standing once a year.

Nearly 40 percent of those responding maintain more demanding progress standards for aid recipients than for the general student body. Over half, however, felt that more of their students would lose their aid eligibility if a standard requiring a C grade point average was implemented.

The vast majority of respondents have appeals processes and reinstatement procedures in place at their institutions. These are designed to provide redress for students who are denied aid because of failure to maintain satisfactory academic progress.

Apparently, satisfactory academic progress standards are a serious issue at the postsecondary institutions responding to this survey. The high percentage of schools that reported they had reviewed their standards in light of the community initiative and the federal government's proposed regulations indicates that campuses are responding to the controversy surrounding this issue.

It is not possible to correlate definitively the apparent awareness on campus with the recent initiatives on the national level. However, it seems a logical assumption that the debate that has taken place in the past few years has played a role in this trend. In fact, it is entirely possible that the NASFAA survey may understate the current situation on campus. The survey was conducted barely six months after the publication of the NASFAA monograph and the issuance of the Education Department's Notice of Proposed Rulemaking on this subject. If another national effort to examine the impact of the community and federal initiatives were undertaken later this year, it could yield better quality data than this initial attempt. It is evident from the NASFAA survey that campuses are responding to the community initiative. The depth and details of this response can be better estimated as institutions, aid officers, and students are given time to interpret and implement the community guidelines.

STATE INITIATIVES

Several states have recently taken measures to enact or strengthen the progress standards for recipients of state-sponsored student financial assistance. The University of California system, for example, is in the process of adopting the guidelines included in the Education Department's Notice of Proposed Rulemaking (May 4, 1982) as its own standard of academic progress. This policy was agreed upon by the University's Financial Aid and Loan Collection Advisory Committee which is comprised of representatives from University of California schools as well as the central administrative office. As of this date, this rule is in its final stages of refinement before implementation. In addition to the Department of Education criteria, the California rule also sets strict limits on the length of time students can be enrolled and still remain eligible for student assistance.

The State of Illinois has been involved in a controversial debate about whether it should impose a standard of progress on its institutions. In 1982, the state legislature failed to approve a measure that would have required all recipients of state assistance to maintain a C average or better. A special study, sponsored by the Illinois State Scholarship Commission, is currently underway to determine the types of policies being employed by institutions in the state and to attempt to determine whether there is a need for statewide intervention.

These examples of state initiatives to assess satisfactory progress standards for aid recipients indicate that this issue is, at the very least, receiving a good deal of attention at every level of postsecondary administration.

IV. OPTIONS AND RECOMMENDATIONS

OPTIONS

After careful review of the current status of satisfactory progress standards for student aid recipients, the Satisfactory Academic Progress Subcommittee of the National Commission on Student Financial Assistance has identified several options for Congressional and departmental action in this area. These options are:

o Adopt the Department of Education's Notice of Proposed Rulemaking on Satisfactory Progress Standards (May 4, 1982).

Adoption of this rule would represent endorsement of the concept of self-regulation and would indicate satisfaction with the reaction of the higher education community to the federal concern regarding the possible or perceived abuse of aid funds by students not maintaining satisfactory progress.

o Urge passage of the Pell-Nickles Bill (S. 2822) requiring a C grade point average for receipt of federal student assistance.

This position would indicate that the Commission is not satisfied that the efforts of the higher education community and the Education Department go far enough to alleviate the causes of abuse that were cited in the General Accounting Office report of December 1981.

o Maintain the status quo.

The choice of this option would indicate that the current situation is well in hand and that further federal intervention is unnecessary or undesirable.

The above options represent simple approaches to addressing the issue of satisfactory progress standards for student aid recipients. As noted previously, however, it is not possible to precisely and fully comprehend the current status of satisfactory academic progress standards on campus. No coordinated federal effort has been undertaken to determine details of the current situation, nor is any planned at this time. It seems unlikely that a course of action that can provide a meaningful remedy to a complex problem such as this can be identified without a thorough understanding of the standards that are now being maintained and enforced at postsecondary institutions, nationwide. With this in mind, the following recommendations are presented.

RECOMMENDATIONS

In order to better assess the current status of satisfactory progress standards and arrive at a resolution to the problems raised concerning this topic, the Commission is recommending a multifaceted approach to a solution. Rather than strictly endorsing any of the available options for resolving this issue, the Commission recommends that the federal government attempt to gain greater understanding of the

present standards maintained by institutions and the level of their enforcement and assume a more active role in monitoring these standards. The Commission recommends that the following procedures be taken in order to accomplish this goal:

- o ADOPT THE U.S. DEPARTMENT OF EDUCATION'S NOTICE OF PROPOSED RULEMAKING (MAY 4, 1982), WHICH INCORPORATES THE POSTSECONDARY EDUCATION COMMUNITY'S SELF-REGULATORY INITIATIVE AND SETS FORTH SPECIFIC ELEMENTS TO BE INCLUDED IN INSTITUTIONAL SATISFACTORY PROGRESS STANDARDS FOR STUDENT AID RECIPIENTS.
- o REQUIRE ALL TITLE IV ELIGIBLE INSTITUTIONS TO SUBMIT A COPY OF THEIR SATISFACTORY ACADEMIC PROGRESS STANDARDS TO THE U.S. DEPARTMENT OF EDUCATION AS PART OF A ONE-TIME EFFORT TO ASSEMBLE THESE STANDARDS.

As part of the next submission of the Fiscal Operations Report and the Application for Campus-based Funding (FISAP) or the Pell Grant Validation Roster which are required of every Title IV eligible institution annually, the Department of Education will require the inclusion of a copy of the institution's satisfactory progress guidelines for recipients of federal student assistance and a description of the manner in which it is disseminated on campus. Failure to submit these guidelines will result in the Department's refusal to disburse Title IV assistance to that school or its students. For those institutions participating only in the Guaranteed Student Loan program, a copy of their satisfactory progress guidelines must

be submitted directly to the Education Department on or before the date that the FISAP is due. This collection of progress standards will be a one-time effort.

o INSTRUCT THE U.S. DEPARTMENT OF EDUCATION, IN COOPERATION WITH CONGRESS AND THE HIGHER EDUCATION COMMUNITY, TO EVALUATE THESE PROGRESS STANDARDS TO DETERMINE THEIR COMPATIBILITY WITH THE DEPARTMENT'S PROPOSED RULE (May 4, 1982). THIS REPORT WILL BE DELIVERED TO CONGRESS WITHIN SIX MONTHS AFTER THE STANDARDS ARE COLLECTED.

The Department of Education, in cooperation with the Congress and the higher education community as specified in Section 482 of the Higher Education Act, will evaluate these guidelines in order to determine their content and compatibility with the Department's proposed rulemaking. The results of this evaluation will be published within six months of the collection of these standards. Institutions whose standards do not conform with the Department's guidelines will be notified that they risk forfeiting their eligibility for Pell Grants, campus-based aid, and Guaranteed Student Loans if they do not revise their standards before the beginning of the next academic year.

o REQUIRE THE U.S. DEPARTMENT OF EDUCATION TO COLLECT AND REVIEW THE STANDARDS OF ACADEMIC PROGRESS DEVELOPED BY INSTITUTIONS THAT APPLY FOR TITLE IV ELIGIBILITY TO ENSURE THAT THESE STANDARDS MEET THE SPECIFICATIONS OF THE DEPARTMENT'S PROPOSED REGULATIONS.

- o REQUIRE POSTSECONDARY EDUCATION INSTITUTIONS TO SUBMIT TO THE U.S. DEPARTMENT OF EDUCATION ANY REVISIONS IN THEIR SATISFACTORY ACADEMIC PROGRESS POLICIES FOR AID RECIPIENTS, AND REQUIRE THE DEPARTMENT TO REVIEW ANY SUCH CHANGES TO ENSURE THAT THEY ARE CONSISTENT WITH THE STANDARDS INCLUDED IN THE NOTICE OF PROPOSED RULEMAKING (MAY 4, 1982).
- o INSTRUCT THE U.S. DEPARTMENT OF EDUCATION TO REQUIRE THAT THE MAINTENANCE AND ENFORCEMENT OF PROGRESS STANDARDS BE EXAMINED MORE CAREFULLY THAN AT PRESENT DURING ANNUAL AND PROGRAM REVIEW AUDITS OF POSTSECONDARY INSTITUTIONS.

The Education Department is instructed to revise its institutional audit guidelines to include a review of the institution's progress policy and investigate the degree to which these standards are being enforced. The maintenance and enforcement of progress standards will be examined during Program Review Audits and internal institutional audits required of Title IV eligible institutions. Institutions found to be maintaining deficient standards (as judged against the Department's proposed regulations) or failing to sufficiently enforce these standards will be subject to loss of their Title IV eligibility if they do not improve their performance significantly before the start of the next academic year. This review shall be conducted in accordance with the standards normally applied during regular program reviews.

- o REQUIRE POSTSECONDARY INSTITUTIONS TO INCLUDE A STATEMENT OR SUMMARY OF THEIR ACADEMIC PROGRESS REQUIREMENTS WITH THE AID-AWARD LETTERS THEY SEND TO STUDENT AID RECIPIENTS.

Postsecondary institutions will be required to include a statement of their satisfactory academic progress standard with letters notifying students of their aid awards. Institutions may include a summary of these guidelines as long as they refer students to the institutional publications and offices where the complete text of the standards can be examined.

- o URGE THE U.S. DEPARTMENT OF EDUCATION TO CONTINUE ITS COOPERATIVE EFFORTS WITH THE HIGHER EDUCATION COMMUNITY AND POSTSECONDARY INSTITUTIONS ON SATISFACTORY ACADEMIC PROGRESS AND TO INCLUDE NATIONALLY RECOGNIZED ACCREDITING ASSOCIATIONS AND AGENCIES IN THIS EFFORT.

The Education Department shall continue its cooperative efforts with the higher education community and postsecondary institutions. The Department will be directed to expand this effort to include nationally recognized accrediting agencies and associations in order to emphasize the need to establish and enforce satisfactory progress guidelines and their importance to institutions that are or expect to be eligible for Title IV assistance.

The National Commission on Student Financial Assistance believes that these recommendations will lead to greater adherence to the Title IV requirements for the maintenance of satisfactory academic progress by student aid recipients. The Commission also believes that the recommendations strike a balance between the community's desire for institutional

autonomy and the need for the federal government to ensure that its student assistance dollars are being spent in accordance with the law.

The Commission wishes to stress that these recommendations are interrelated, and must be considered as a package. The recommendations complement each other and cannot be adopted separately.

APPENDIX A

Self-Regulation Initiatives: Guidelines for Colleges and Universities

No. 5
December 1981

Joint Statement on Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility

The Board of Directors of the American Council on Education approved this statement on October 13, 1981, following a process of review and comment among other education associations. We are grateful to the American Association of Collegiate Registrars and Admissions Officers and to the National Association of Student Financial Aid Administrators for developing this statement, which outlines the elements of good practice that institutions should follow in meeting the federal requirement that students be making satisfactory progress in their studies in order to continue to receive federal financial aid.

We urge all colleges and universities to review these guidelines as a basis for ensuring the proper administration of financial aid funds.

J. W. Peltason, President

The Education Amendments of 1978 required that institutions limit federal financial aid to those students who, according to institutional standards, were in good standing and making satisfactory progress. A 1978 study of the management of federal financial aid programs by the General Accounting Office took serious exception to the paucity of such standards and to evidence of institutional nonadherence even when standards did exist.

Senator Pell (D.-R.I.), who held hearings on the subject of satisfactory academic progress during the development of the 1980 Education Amendments, proposed a requirement that students successfully complete at least 75 percent of their initial academic load per term or period. Although he was persuaded not to insist on so stringent a requirement, the intent of Congress clearly was to give the education community an opportunity to develop effective self-regulatory standards. The need for such standards has increased with the recent removal of the limit on years of eligibility for receiving Pell and SEOG awards.

The American Association of Collegiate Registrars and Admissions Officers and the National Association of Student Financial Aid Administrators have proposed the following guidelines to assist institutions in developing their own standards of satisfactory academic progress to maintain federal financial aid eligibility. In doing so, institutions should consider the relation between these standards and other institutional policies regarding academic progress.

A. Each institution should take all necessary steps to fulfill the federal requirement to implement and make public the standards for satisfactory academic progress that students must meet to be eligible to receive federal financial aid.

   The statement of institutional policy on satisfactory academic progress for purposes of continued aid eligibility should be available to all requesting it and should be made public through readily available institutional publications. Each federal financial aid recipient should be provided with a copy of the institutional statement of satisfactory academic progress.

B. In establishing standards of satisfactory academic progress, each institution should respond to the diversity of its students and academic programs. Within a given category and program, such standards should be applied consistently to all students receiving federal financial aid.

   Each institution should establish standards in accordance with the diversity of its students, for instance, to recognize differences in educational objective and between full-time and part-time status. Once established, such standards should be uniformly applied to all students receiving federal financial aid within a given category. For example, all full-time students in a given institution and program should be expected to maintain the same minimum academic progress.

C. Each institution should establish and announce a reasonable length of time for students receiving federal financial aid to complete their educational objectives. This time should be consistent with the academic goal of the student and would vary according to enrollment status. The institution's policy on standards of academic progress should include a statement of the effect on academic progress and financial aid eligibility of course incompletion, course withdrawal, course repetition, and noncredit remedial courses.

   Institutions should establish limits on the amount of time allowed for students in different enrollment categories (e.g., full-time, half-time) to complete their objectives to be eligible to receive federal financial aid. The time established should include any additional time needed to complete noncredit remedial courses. The institution's policy should clearly describe the effect on satisfactory progress of course incompletion, course withdrawals, and course repetition. A given institution may decide to impose a limit on the number of course incompletions, course withdrawals, and course repetitions. Clock-hour institutions should establish a maximum number of clock hours of instruction for students to complete their programs.

D. Procedures for appeal and reinstatement of aid should be part of each institution's policy on satisfactory progress and should be readily available in writing to all students receiving federal financial aid. When an institution denies aid, reviews a case, or reinstates a student who was previously considered not to be making satisfactory progress, documentation to justify the action must be maintained.

Institutional policy should clearly describe the procedures for appeal and reinstatement, possibly including the conditions under which an appeal may be sought and the procedures by which students may satisfy the deficiencies that led to ineligibility.

E. Evaluation of a student's academic standing and progress to determine federal financial aid eligibility should be made before each award period, but no less often than once per year.

Although some institutions are able to make a formal evaluation of a student's progress after each academic term, many other institutions, due to processing and time constraints, are not able to do so. If an institution can complete formal evaluations only once per year, an effort should be made to conduct more frequent evaluation/monitoring during the year. This will be particularly important in situations involving a probation/warning status or with appeals and reinstatement.

This statement is one in a series of policy guidelines developed to help higher education respond to issues by means of voluntary self-regulation. The Office on Self-Regulation Initiatives, a program of the American Council on Education, works cooperatively with representative associations and institutional leaders in identifying issues on which self-regulation is needed, formulating responses to those issues, and distributing the resulting guidelines and recommendations.

College and university administrators are urged to review the guidelines as a basis for considering changes in existing institutional policies. Each statement is developed through a process of wide review among representatives of different types of institutions and professional responsibilities in higher education. They are intended to summarize general principles of good practice that can be adapted to the specific circumstances of each college and university.

The statements are not copyrighted and may be reproduced in the interest of education. Permission for resale, reprinting, or commercial use should be requested in advance from ACE's Publications Department.

For further information, contact Elaine El-Khawas, Director, Office on Self-Regulation Initiatives. Additional copies of this statement may be obtained upon request to the office. Please include a self-addressed, stamped envelope.

American Council on Education
One Dupont Circle, Washington, D.C. 20036

APPENDIX B

STANDARDS OF SATISFACTORY ACADEMIC PROGRESS TO MAINTAIN FINANCIAL AID ELIGIBILITY— A SELF-REGULATION INITIATIVE

NASFAA MONOGRAPH SERIES
NUMBER I APRIL 1982

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ACKNOWLEDGEMENTS

This Monograph has been prepared for use by institutional administrators in reviewing and evaluating their institution's satisfactory academic progress standards. The statement outlining the elements of good practice that institutions should follow in developing reasonable standards of satisfactory academic progress and subsequently this Monograph were undertaken as a self-regulation initiative by NASFAA's Title IV Committee under the leadership of Sumner B. Gambee, Associate Dean, California State University.

NASFAA is grateful to Jennifer Dowd, Director of Financial Aid, Mercer County Community College for her untiring efforts in the development of this project. As a member of the Title IV Committee, she worked with the American Association of Collegiate Registrars and Admissions Officers in developing the Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility. Subsequently, she wrote the first draft of the Monograph. Thanks also go to Judith Skurski, Director of Financial Aid, Niagara University, who assisted Jennifer in writing the Monograph. The principal staff work on this project was conducted by Joan Holland with invaluable assistance from Dallas Martin and Dennis Martin. To these persons and all other NASFAA members who provided input, we are grateful.

Members are encouraged to send comments or recommendations about the Monograph to the NASFAA office.

Donald E. Holec
President 1981-82

INTRODUCTION

Over the past few years, financial aid has grown dramatically in size and significance. Today, student aid is a major component of the financial picture for most postsecondary institutions. Nationally, financial aid is a large and complex subject, encompassing diverse programs and totaling more than $14 billion annually in federal, state, private and institutional expenditures. Of this amount, approximately $7.8 billion comes from the federal government.

The rapid growth and complexity of student aid and its increasing importance to postsecondary institutions has raised concerns on the part of the financial aid community and the federal government regarding stewardship of aid funds. Faced with increasing numbers of student aid applicants, constantly changing statutory requirements, and an evergrowing set of complex program regulations and recordkeeping requirements, aid administrators have necessarily devoted more time and resources to day-to-day management of financial aid operations. For this reason, aid administrators have been unable to focus attention with equal priority on broader policy decisions and philosphical questions at the very foundation of student aid programs.

Recognizing the importance of establishing consistent guidelines to assist institutions in the sound administration of student aid, the National Association of Student Financial Aid Administrators (NASFAA) adopted as one of its primary objectives the development of self-regulatory initiatives. In the fall of 1979, the Title IV Committee of the Association was charged with the responsibility of developing criteria for satisfactory academic progress.

The need to have a uniform consistent set of standards governing satisfactory academic progress became even more apparent when Congress considered imposing strict guidelines as a part of the Education Amendments of 1980. This Congressional interest was not new. As early as the Education Amendments of 1976 the Congress required institutions to limit federal financial aid to those students who, according to the institution's own standards, were maintaining satisfactory academic progress in a course of study. Congressional interest was heightened by a 1979 General Accounting Office Study and subsequently proposed regulations being discussed by the Department of Education. The Conference Committee which met to resolve differences between the House and Senate versions of the Education Amendments of 1980 agreed, after careful consideration, to recommend that the issue of satisfactory progress be studied by the National Commission on Student Financial Assistance created by this legislation. The Commission was charged with the task of reporting to Congress, within one year of its initial deliberations, on the question of satisfactory progress.

While Congress was clearly concerned about this issue, it also recognized it should not intrude into institutional decisions and, therefore, gave the education community the opportunity to develop its own self-regulatory standards for satisfactory academic progress.

This awareness prompted NASFAA and other higher education associations to become intensely involved in this issue. Working in conjunction with the

American Association of Collegiate Registrars and Admissions Officers, NASFAA developed a joint statement on Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility. After review and acceptance by many of the primary higher education associations represented in the Secretariat of the American Council on Education, a joint self-regulatory statement was published. The statement identifies elements of good practice which post-secondary educational institutions should follow to ensure that students continue to receive financial assistance only if they are making satisfactory academic progress. The intent was to achieve a set of standards which could apply not only to receipt of federal assistance but to state, private and institutional aid as well.

The joint statement attempts to define principles to be incorporated into institutional policies, but does not, in and of itself, attempt to define specific mechanisms and procedures for implementing these policies. This monograph, on the other hand, expands on these elements and gives concrete suggestions for individual institutional implementation. It also includes actual policies with sample cases from various types of institutions. Further, it includes an institutional checklist and references which may provide additional information on the subject. It is hoped this publication will be a valuable tool in assisting institutions to evaluate current standards and administrative procedures.

ESTABLISHMENT OF AN INSTITUTIONAL POLICY

Shared Responsibility

The administration of financial aid programs has undergone many changes over the past several years. The vast increase of federal funds in Title IV programs, coupled with rising educational costs and demand for assistance, has put the financial aid administrator more at the center of the institution's academic and fiscal affairs. The resultant challenge is to balance often conflicting needs imposed by the institution itself, its students, and federal and state statutes and regulations. The objective is to establish a satisfactory academic progress standard that is consistent with institutional goals and philosophies and, at the same time, sensitive to needs of students and proper custodianship of public funds. For example, while the institution is required to ensure federal funds are being administered in a manner consis--tent with applicable laws and regulations, its academic progress standards can also influence such profound institutional concerns as recruitment and retentior. Although student aid administrators can ensure efficient management of aid funds, they cannot on their own be expected to formulate a policy that interacts with so many different aspects of the institution's administration.

Formulating Institutional Policies for Satisfactory Academic Progress

While the Director of Financial Aid has primary responsibility for initiating policy discussions relative to student assistance, few administrative

functions at the institution generate policy that impacts as many other areas as does financial aid. The formulation of academic standards for financial aid eligibility is certainly one policy area which affects other institutional units. This type of policy development should not only be a function of all parties affected, but should result from a specific charge to a group selected by the chief administrative officer of the institution to ensure its acceptance and successful implementation.

The mechanism used to generate such policy development may take different forms depending on the type of institution but will generally involve appointment of a special task force or ad hoc committee to study this particular issue, or assignment of a specific charge to a standing committee already responsible for this area.

While all institutions vary significantly in governance and organizational structure, typical representation might include such institutional personnel as:

--the Academic Dean/Vice President or Curriculum Director;

--the Financial Aid Director who has specific knowledge of students receiving financial aid and who has the ultimate responsibility for notifying students of eligibility for student aid funds;

--the Registrar who has specific information on typical course loads, failure/withdrawal rates, and enrollment periods;

--the Admissions Director, who is concerned with recruitment and its relation to the institution's goals and policies;

--a Faculty Representative, who can speak to curriculum load, grading practices, etc.

--a representative from any program catering to special or non-traditional students who may have differing educational needs or capabilities;

--a student representative(s), who can provide a recipient view of proposed requirements.

In identifying appropriate personnel to study the issue of satisfactory academic progress, and in considering policy questions to be addressed, several factors must be considered. These include size of institution, its resources, the composition and needs of the student body, and general goals and objectives of the institution itself.

Each institution's policy will vary to a certain extent to fit its own needs and the needs of its students. Yet, at the same time, a number of

common areas must be addressed by those charged with the responsibility of formulating such a policy.

The initial decision which generally confronts those involved is whether existing academic standards of the institution are sufficient for purposes of determining eligibility for financial aid. There are two schools of thought on this issue. On the one hand, some institutions consider it unwise to develop two standards, one general and one for financial aid recipients, since this treatment could be inconsistent and perhaps arbitrary. Conversely, other institutions recognize that public funds are limited and require more rigid parameters of eligibility. In this latter school of thought, recipients of federal student assistance are subject to a different, more demanding standard of academic performance than the institution itself imposes for continued enrollment purposes. Given the diversity of institutions, there can be no absolute standard, nor should there be. Each institution must consider its options and base its policy on the best interest of its students and its own institutional mission.

An influencing factor of the institution's mission may be the standards it sets in admitting students. For example, some open-door community colleges or publicly supported institutions may be required to embrace the concept that all students be allowed to enroll regardless of past or current academic performance. At such institutions, standards to maintain financial aid eligibility may need to be developed that are more rigorous than those otherwise used. Other types of institutions may have differential admissions criteria or curriculum offerings for special categories of students. In such cases, particular attention should be given to developing standards that are responsive to the unique needs of these particular groups of students. In the case of an institution with very selective admissions criteria, care should be given to developing consistent policies.

While the de ision of whether to use separate standards clearly rests with the institution, it is recommended that, academic progress standards be consistently employed in terms of the various types of aid available, and each institution's need to ensure that financial aid dollars are properly used.

POLICY CONSIDERATIONS

Essential to the development of institutional policy is the thorough understanding and review of any factors which might influence its success. Regardless of the type of institution, several factors are worthy of consideration in developing standards for evaluating satisfactory academic progress.

Time Limits on Financial Aid Eligibility

The concept of satisfactory academic progress should include a principle that encourages both quantitative and qualitative progress. That is, the student should be moving toward some definite educational goal at a reasonable rate. Therefore, an important step in developing such policy should involve the setting of satisfactory progress standards which consider the "normal time frame for completing the course of study."

The absence or leniency of quantitative academic progress standards can lead to students remaining in school and continuing to receive financial aid for indefinite periods of time. The standard adopted should be sufficiently restrictive to prevent fiscal abuse while at the same time protecting the students' interests. In establishing standards of satisfactory academic progress, each institution should respond to the diversity of its students and academic programs. Within a given category and program, such criteria should be consistently applied to all students receiving financial assistance. For instance, the institution, in its development of these standards, should recognize differences in educational objectives and student status, i.e., full-time and part-time.

Placing a four-year limit on receipt of financial aid funds for full-time students may well be acceptable at an institution with competitive admission standards and a student body that routinely completes courses of study within that time frame. On the other hand, institutions with a high number of parttime students frequently have student bodies with significantly external commitments, i.e., jobs and family responsibilities in particular, which preclude their completion of course work at the same rate as the institution's more traditional, full-time students.

Non-traditional students may have particular educational needs which increase the length of the program. The institutional policy should consider specific needs of the student who requires an extra period of enrollment in refresher or remedial courses prior to entering the mainstream. A policy allowing too little leeway for these students will lead to an endless series of unnecessary exceptions. Conversely, a policy written to encompass every conceivable exception leaves itself open for abuse.

Measurement of Progress

Once the institution has established the time period it will use to monitor academic progress, it must then identify components or measurements--credits, grade or projects completed--necessary to do the evaluation. Several questions relating to the measure of progress must be addressed.

Does the institution wish to consider absolute credit or clock hours completed per enrollment period or does it wish to take a ratio of credits earned to credits attempted?

Many institutions require students to maintain specific enrollment levels in order to receive financial aid. Indeed minimum standards are required for federal programs. However, in addition to enrolling in certain courses at certain levels, it is also necessary that students earn sufficient credit in these courses so they can advance. However an institution decides to measure credits--in terms of absolute credit earned or a percentage of credits attempted--any definition of academic progress must place emphasis on advancement toward curriculum objectives via accumulation of credits or by completion of compulsory tasks and assignments.

Should grade point average be considered?

Institutions generally use grade point average (GPA) as a key indicator

of academic progress. To graduate or complete course of study, students are normally required to attain a "C" average, e.g., 2.0 on a 4.0 scale. Actual requirements may vary considerably among institutions and are usually tied to other factors, such as number of credit hours a student has attempted or length of time the student has been enrolled. Some institutions require maintenance of a "C" average as a static requirement while other institutions require students to maintain a certain GPA based on a sliding scale--1.50 in the first term or freshman year, 1.75 in the second. Still others allow students to be enrolled for a specified period of time before the standard is applied; however, at the end of such time, a minimum GPA should be required.

Regardless of the policy adopted by the institution, the academic status of each student receiving aid dollars should, if at all possible, be carefully reviewed during each term of enrollment to determine whether satisfactory progress is being made. This step will prevent the student from getting too far behind before corrective action is taken.

If the institution has a non-punitive grading policy, how will these grades be treated with respect to eligibility for student aid?

Grades which have no effect on the GPA or do not count toward program completion (non-punitive grades) should be carefully considered in the development of institutional policy relating to satisfactory academic progress. In some instances, institutions allow students to receive a non-punitive grade for course withdrawal and/or for courses not completed or later repeated. This policy distorts the student's actual academic standing by not only allowing them to maintain higher GPA's, but also by increasing the time necessary to complete a course of study.

If the institution chooses to allow use of non-punitive grades, it is strongly recommended that some type of restriction be imposed to limit the number of times a student can repeat a course and still receive student aid. The policy should also address any exceptions to be considered in the event of illness or some other type of disruption which is clearly beyond the student's control.

Should withdrawals or non-attendance be treated in the same way as outright failure?

While allowing students to withdraw from courses may, for some institutions, be an acceptable policy, the extensive use of such a practice can lead to abuse if the policy is too permissive. In other words, a student's concerns about maintaining satisfactory academic progress can, in some instances, lead to withdrawal from courses where grades are lowest, thereby keeping the grade point average higher and extending the time necessary to complete the course of study.

A lenient withdrawal policy may also affect a student's full-time status. For instance, if a student registers for five three-hour courses and withdraws from two of them, he or she would change from full-time to part-time status. Depending on the institution's policy and/or federal or state regulations regarding student status for recipients of aid, this situation could necessitate an adjustment in aid awarded.

Another related problem which should be addressed involves unofficial withdrawals. Essentially this occurs when a student simply ceases to attend classes. The institution's policy should ensure that such cases are equitably treated. Some institutions may wish to establish a specified number of absences after which the student would no longer be considered enrolled in the course; other institutions may find this approach impractical and may want to deal with this issue differently.

Will the institution permit use of incomplete grades?

When a student has not met all requirements of a course by term's end, some institutions permit the instructor to assign a temporary grade of incomplete. After the student has met course requirements, a traditional grade is assigned. A policy regarding use of such a grading practice will impact the institution's academic progress standards by inaccurately reflecting a student's GPA. To prevent this, an institution using imcomplete grades may wish to impose a time limit on course completion and number of incomplete grades each student is permitted to have during a specified period of time. The penalty for failure to adhere to the policy should be clearly stated and consistently enforced. The institution may also wish to limit a student's aid to the term in which the initial course was undertaken.

How will the institution assign grades for courses repeated?

Most institutions allow students to repeat courses in which unacceptable grades were received. The method of assigning such grades varies among institutions. In some cases, each grade received appears on the student's record and is used in computing GPA. Other institutions permit students to receive credit only for the highest grade assigned and lower grades are removed from the student's record.

Regardless of the method used to assign grades for repeated courses, the institution may wish to (1) limit the number of times a student can repeat a particular course and receive financial aid; and/or (2) limit the total number of courses a student can repeat and still receive financial aid.

Frequency of Monitoring and Evaluation and Time Frame For Notification

Within the time frame stipulated for program completion, the institution should establish bench marks for satisfactory completion rates at regular intervals which are consistently applied for all students. Whether these monitoring activities occur at the end, mid-point, or another time during the term, they should be uniform, timely and frequent enough to prevent abuse of the institution's policy.

While evaluation on a term-by-term basis is strongly recommended, it can only be effective if grades are computed on a timely basis. If grades are not generated until the next term has begun and the institution has chosen to distribute aid, the institution may choose to conduct formal evaluation only once per year with more frequent warning notices to students who appear to be in potential danger of not maintaining satisfactory academic progress. The

use of interim progress reports is an effective method for ensuring the identification of potential problems on a regular basis. If this approach is used, the institution must take necessary precautions to ensure consistent treatment of all students.

Regardless of the method employed to monitor and evaluate a student's progress, notification to students of financial aid status as it relates to academic criteria should, be individual and confidential. It should also, if possible, contain suggestions for assistance, e.g., counseling, tutoring, academic advisement, testing, etc.

Evaluation of Academically Disadvantaged Students

An additional point to consider in developing a monitoring system for satisfactory academic progress is the applicability to students in remedial or enrichment courses. The institution must decide whether it will evaluate students admitted in a remedial program or on probation who later join a regular program of study on the same basis as those initially admitted into the regular program. The question then arises as to whether students enrolled in remedial or enrichment courses will be better served if the same progress standards are applied, or whether a modified standard should be adopted.

Withdrawal and Reinstatement of Financial Aid Eligibility

The next major decision in the development of an institution's policy governing satisfactory academic progress involves action to be taken and time considerations should the student fail to complete required credit or clock hours during a given time period. Should the student's aid eligibility be terminated at the time it is determined he or she is not making satisfactory progress or will the student be given a specified period during which grades may be improved and/or previous deficiencies corrected?

While many institutions grant a warning or probationary period prior to suspension of student aid eligibility, the length of time for this warning status, and indeed its very existence, is a matter for institutional decision. Reasonable options to be considered for the probationary period may include a longer period for beginning students.

Allowing the student to complete a succeeding enrollment period before aid funds are suspended may be a necessity if the institution does not have the capability of monitoring grades each term. This approach would likely reduce the number of exceptions which might occur under more stringent restrictions.

The requirements which a student must meet to return to recipient status should be carefully considered by the institution. Many institutions require a student to complete successfully an intervening enrollment period. Others require the student to complete satisfactorily and finance without additional student aid that number of credit clock hours previously attempted but not passed. This latter practice has advantages and disadvantages. While this option would alleviate the problem of a student repeating the same course(s), the student might not have access to funds necessary to cover this expense in just one term. Such a restriction could force the student to take

fewer number of hours or withdraw from school completely for a period of time. While such an absolute policy effectively negates misuse of aid funds, it may constitute too harsh a treatment for special circumstances and may, for financially disadvantaged students, prevent further access to higher education. Withdrawing from school for a period of time may well be a viable option for some students. Others, however, may find it difficult to re-enroll because of personal and/or financial reasons. Exceptions such as these should be clearly addressed in the institution's appeals procedures.

Appeals Procedures for Reinstatement of Financial Aid Eligibility

It is essential to have mechanism through which personal circumstances can be evaluated and when appropriate, exceptions made to the institution's policy governing satisfactory academic progress. Depending on the circumstances, some institutions tie financial aid eligibility to academic conditions for the subsequent term. Requiring students who have failed to maintain satisfactory academic progress to participate in special programs--counseling, tutoring, remedial or refresher courses may make better educational sense than simply denying further aid without the benefit of guidance and the potential for improvement and ultimate success.

Any policy, once implemented, should allow for professional judgement in determining when there are exceptional circumstances. While it is not generally considered prudent to enumerate all conceivable exceptions, it would be advisable to suggest categories under which exceptions will be considered and any documentation which the institution may require. Clearly stating the limiting conditions under which an appeal will be heard may reduce unnecessary burdens on those selected to hear appeals and may help curb unrealistic hopes for students. For example, excessive absence or failure to complete required assignments might be appealable because of illness of the student and/or a dependent or a death in the family. Documentation to substantiate the appeal could consist of a letter or statement from the student, a physician or a minister; or some other proof of the circumstances.

In addition to declaring appealable elements of the institution's policy, precise steps or procedures must be clearly identified. If the institution chooses to utilize an appeals committee, the structure should allow for timely covening of the committee as well as timely decision making. Other questions must also be addressed. Will the student be required to submit an appeal in writing and/or appear in person to discuss reasons for the appeal? Who should be represented on the committee? Will the course instructor be involved in the appeals process? How often will appeals be heard?

POLICY DISCLOSURE

Once the institution's policy for determining satisfactory academic progress has been formulated, adequate disclosure is a must to ensure clear understanding, acceptance, and success. While notification of standards for continued receipt of student aid may best be given at the time aid is awarded, some institutions may find publishing such a policy in institutional catalogs or student handbooks adequate for their particular clientele. Regulations governing Title IV student aid programs require institutions to provide in

appropriate publications: the criteria for continued student eligibility under each Title IV program; the standards for making satisfactory academic progress; and, the criteria for reestablishing eligibility for student aid. Such information must be made readily available to current students and to prospective students upon request.

It is extremely important to directly inform all groups who are, or will be, affected by the policy. Students receiving financial aid may be sent a special mailing or the policy may be included in award notices. Likewise, the policy should be distributed to faculty and staff who are involved with academic advising or counseling and those who work with special educational programs.

The Financial Aid Office should be assertive in periodically disseminating the information through memoranda, articles in the student paper or other campus publications, bulletin board notices and meetings with those groups that may need clarification. To successfully implement a policy, all groups affected must be informed and understand its implications.

EVALUATION OF POLICY

In order to ensure a viable, working policy at your institution, the policy should be reviewed annually. Institutions should maintain data and statistics on the financial aid student population who are placed on financial aid probation or denied aid due to a failure to maintain satisfactory progress as defined by the institution. The data could include the number of students affected by school, major courses of study, class, race, and gender. The financial aid administrator would use this information to evaluate the appropriateness of the institutio al policy and to suggest changes where appropriate.

CONCLUSION

The establishment of a policy that identifies a set of standards for satisfactory academic progress is not an easy task. Yet, a well publicized and disseminated policy will help lessen confusion and misunderstanding on the part of students, and will help ensure the equitable treatment of all students.

The importance of having such a policy cannot be stressed enough. It is an important tool by which the financial aid administrator may be guided in making difficult administrative decisions that affect students. NASFAA strongly urges each institution to review its policy to ensure that it provides for proper custodianship of public funds, preserves the integrity of the institution, and addresses the needs of the students.

SAMPLE POLICIES AND CASE EXAMPLES

CASE ONE

The following policy is of note due to its "leeway" concept. It allows students an occasional class failure but effectively prevents financial abuse. The policy also clearly explains how summer aid is viewed within maximum financial aid program length and also the more stringent requirements for a student enrolled in a second degree program.

SAMPLE INSTITUTIONAL POLICY

Introduction

The Higher Education Act of 1965, as amended by Congress in 1980, mandates institutions of higher education to establish minimum standards of "satisfactory progress" for students receiving financial aid. The University makes these standards applicable to all institutionally awarded funds and the Guaranteed Student Loans and Federal y Insured Student Loans for the purpose of mai..taining a consistent policy for all students receiving assistance.

Procedures

Students must maintain satisfactory progress according to the following formulas in order to continue to receive financial aid or Guaranteed Student Loans at the University.

I. Students Receiving Full Financial Aid

A. Undergraduate Formula:

12 credits x the number of semesters on aid
+6 credits x the number of summers on aid
= total credits required to maintain progress
-6 credits allowed as leeway
= total credits to meet minimum satisfactory progress

The six credit hour leeway is applied to the total hours required to allow for extenuating circumstances. This leeway is the total number of hours during the student's undergraduate years. It is recommended that if you as a student fall into the 6 credit leeway that you take more credits the next term in order to make up for the credits you fell behind on. The 6 credit leeway will be available in case of a personal or academic problem.

If the minimum satisfactory progress is not met, the student will be terminated from aid.

B. Graduate Formula:

5 credits x the number of semesters on aid (after spring semester 1980)
+3 credits x the number of summers on aid
= total credits normally required to maintain satisfactory progress
-3 credit hour leeway
= total credits to meet minimum satisfactory progress

The three credit hour leeway is applied to the total hours required. The three credit hour leeway is the total number of hours during a student's graduate years on aid by which the academic workload can be reduced. If the minimum satisfactory progress is not met, the student is terminated from aid.

II. Students Receiving Part-Time Financial Aid

Both undergraduate and graduate students must complete the number of credits for which aid was given as a part-time student (taking less than 12 or 15 credits respectively). The same leeway will be applied as stated above.

If satisfactory progress is not met, the student will be terminated from aid.

III. Total Semesters on Financial Aid

Undergraduate students are eligible to receive financial aid for 10 semesters with summers counting as one-half. Graduate students are eligible to receive 6 semesters of aid as a full-time student, with summers counting one-half. Part-time students are extended proportionately. Students pursuing a second undergraduate degree may receive only 4 semesters.

IV. Reinstatement

After termination from aid, a student can be considered for financial aid only when enough credits have been completed to make up any credits short of normal satisfactory progress for all the semesters and summers a student was on aid.

V. *Guaranteed Student Loans for Federally Insured Student Loans*

The same policies for undergraduate and graduate students as stated above, apply to recipients of the Guaranteed Student Loan and and Federally Insured Student Loan. The maximum number of semesters on aid does not apply. Program dollar limits supercede this policy. Students enrolled for fewer than full-time hours must complete the number of credits for which the loan was given.

VI. *Special Note to Undergraduate Students*

It normally takes 124 credits to obtain a bachelor's degree. To graduate in four years, a student must enroll for a minimum of 15-16 credits per semester. Enrolling for 12 credits (minimum for full-time students) would extend graduation 1-1½ years. There are some program limits that would make this last year difficult. For example, some programs have a limit of 8 semesters (part-time is proportionately more). This is informational only, but the Office of Financial Aid/Student Employment wishes to make you aware of it.

VII. *Notification*

The Office of Financial Aid/Student Employment will notify by letter any student receiving financial assistance who does not meet minimum satisfactory progress and is being terminated from aid. The notice will be addressed to the student's most current local address on file with the Office of Financial Aid/Student Employment. IT SHALL BE THE RESPONSIBILITY OF THE STUDENT TO INFORM THE DEPARTMENT OF A CORRECT MAILING ADDRESS AT ALL TIMES.

VIII. *Appeals*

Any student who has been terminated from financial aid has the opportunity to appeal such action to the Financial Aid Advisory Committee. Contact the Office of Financial Aid/Student Employment for an appointment with the Committee. Any further appeal would be directed through the University grievance procedures.

APPLICATION OF POLICY

Jim is a freshman this year. He registers for 12 credits in the fall semester and earns 12 credits. He registers for 12 in the spring but does poorly in one course. He earns only 9 credits in the spring. Jim applies for aid for next year. His eligibility, according to the institutions satisfactory academic progress standards, is determined as follows:

12 credits x 2 semesters on aid	24
+6 credits x number of summers on aid	0
total credits required to maintain progress	24
credits allowed as leeway	-6
credits to meet satisfactory progress	18

Jim earned 12 credits in the fall and 9 in the spring for a total of 21 credits, thus, he meets the minimum required and is an eligible applicant for aid next year.

* * * * *

. . .

John is a junior who earned 12 credits in each semester of his freshman and sophomore years, for a total of 48 credits. In his junior year, he performed poorly, earning only 6 credits in the fall and none in the spring. John applies for aid in his senior year. As indicated below, he has not made satisfactory academic progress.

12 credits x 6 semesters on aid	72
+6 credits x 0 summers on aid	0
total credits required to maintain progress	72
credits allowed as leeway	-6
credits to meet minimum satisfactory progress	66
credits actually earned	54

Therefore, John must finance his first semester in his senior year or pursue the appeal process with the financial aid advisory committee. To be eligible for reinstatement of his financial aid eligibility, John must pass 12 credits in this first semester.

CASE TWO

The following policy requires that students successfully complete a yearly, rather than semester, minimum number of credits. The document shows students how to make up any credit deficiencies and how their aid will be affected. Grade point average requirements are dealt with in the general academic requirements of the institution.

SAMPLE INSTITUTIONAL POLICY

UNIVERSITY STUDENT FINANCIAL AID OFFICE

Academic Standards

To receive financial aid at the university, a student must (1) enroll as a full-time student (exception, Pell Grant); (2) be in good academic standing; and, (3) make satisfactory academic progress.

Enrollment Status

Student enrolled for 12 undergraduate hours or nine graduate hours are considered to be full-time. The Pell Grant may be used for as few as six semester hours of undergraduate enrollment. The amount of the grant for such part-time enrollment (six to eleven hours) will be reduced proportionately.

Good Academic Standing

For purposes of receiving financial assistance, good academic standing is defined as continued enrollment at the university. Students who withdraw from the University during a semester will be expected to repay an appropriate amount of aid awarded. (Exception: College Work-Study Program.)

Satisfactory Academic Progress

During any year in which the student receives financial assistance, that student must average 12 completed credit hours for each semester. Typically, a student who attends both fall and spring semesters and who does not attend summer school, must complete 24 credit hours during those two semesters. A student who does not complete the 24 hours has the following options:*

1) Enroll for the necessary number of hours during the summer term (without summer financial aid). Successful completion would reestablish aid eligibility for the following fall semester.

2) Apply for summer financial aid and, if awarded, register for 12 hours plus the necessary number to bring total (fall, spring, and summer) to 36 hours. Successful completion of these hours would re-establish aid eligibility for the following fall semester.

3) Not attend the summer term and for the fall semester (without financial aid) enroll for 12 hours plus the necessary number to bring total (fall and spring from the prior year plus fall semester) to 36 hours. Successful completion of these hours would re-establish eligibility for the spring semester.

*9 hours for graduate enrollment

For example, a financial aid recipient who completes only 22 hours during the fall and spring semesters of 1978-79 may:

1) Take 2 hours during the summer term, "79 without financial aid."

2) Take 14 hours during the summer, "79 with financial aid (assuming it is available)."

Successful completion of either (1) or (2) will cause the student to be eligible to continue financial aid during the fall of 1979.

3) Take 14 hours during the fall, without financial aid, to re-establish eligibility for the spring semester, 1980.

For students receiving part-time Pell awards, the required number of hours to be completed will be reduced proportionately.

APPLICATION OF POLICY

Ginger is a sophomore who earned 24 credits in her freshman year. She must take organic chemistry in the fall semester of her sophomore year, since her major is chemical engineering. Ginger elects to take a total of only 9 credits in the fall, including organic chemistry. She feels she will need a lighter course load to devote more time to the demands of organic chemistry. Ginger does well in the fall semester and earns all 9 credits.

In order to make satisfactory academic progress, Ginger must increase her course load in the spring of her sophomore year. Thus, she takes five courses, for 15 credits. She feels she can manage a course load of this size since organic chemistry is out of the way. It isn't easy, but Ginger does well and earns all 15 credits.

As an applicant for aid in her junior year, Ginger meets the satisfactory academic progress requirements because she has averaged 12 credits per semester, and has completed 24 units of work per year.

* * * *

Sam is a freshman. He gets off to a shaky start by earning only 6 of the 12 credits he registered for in the fall semester. He does better in the spring, and earns a total of 14 credits, but after his first year he only has 20 credits. As he applies for aid in his sophomore year, he cannot demonstrate that he is making satisfactory academic progress.

Sam has several choices. He can take 4 hours of credit during the summer. If he earns this credit then he will have earned 24 credits prior to his sophomore year, and he will be back on track. Of course, Sam can receive no financial aid for these summer courses. Earnings from his summer job, normally to be expected for next year's expenses, will probably be used to pay for summer school expenses.

Another option Sam has, if financial aid is available, is to use the summer as a replacement for one of his regular semesters of study. Thus, he could take 16 credits in the summer (the normal 12 plus the 4 he needs to make up). In this way, he can get back on track by changing his degree path and using a future semester of aid earlier than originally planned. Possible pitfalls in this approach are that Sam may not receive sufficient aid during the summer to make it possible -- generally very little if any funds are left over after the end of the regular academic year -- and the courses Sam needs for his major may simply not be offered in the summer.

Another option, if Sam and his parents can afford it, is for Sam to enroll in the fall semester of his sophomore year without financial aid, and do well enough to be reinstated as an eligible aid applicant by the spring semester.

CASE THREE

The following is a simply stated but rather strict policy on satisfactory progress requirements. This particular institution considers that college students at all levels of their studies, should complete the same minimum course load per semester. Note how this institution clearly itemizes all aspects of the academic policy including appeal and reinstatement requirements.

SAMPLE INSTITUTIONAL POLICY

Measurable Satisfactory Academic Progress

A. Measurable Satisfactory Academic Progress for a full-time student means:

1. The student must complete a minimum of 12 credits each quarter of enrollment.

2. The student must maintain a quarterly GPA of 2.00 and have a cumulative GPA of 2.00.

B. Measurable Satisfactory Academic Progress for a part-time student means:

All requirements and procedures outlined in the Review Policies and Financial Aid Probation for full-time measurable academic progress apply to part-time students as well, with the following exceptions:

1. The student attending half-time (6-8 credit hours) must complete 6 credits each quarter.

2. The student attending three-quarter time (9-11 credit hours) must complete 9 credits each quarter.

3. The student must maintain a quarterly GPA of 2.00 and have a cumulative GPA of 2.00.

C. Review Policies:

1. Following every quarter the GPA and number of credits earned by each Financial Aid recipient will be entered into his/her official student financial aid record.

2. The following shall be considered as credits completed:
a. "A" through "D" grades
b. "S" passing with credit

3. *The following shall not be considered as credits completed:*
   a. *"F" grades*
   b. *"E" audit, no credit*
   c. *"W" withdrawal*
   d. *"I" incomplete*
   e. *"X" unofficial withdrawal*
   f. *"I" course in progress*

4. *Students who do not complete any credits or who receive a 0.0 GPA in a particular quarter will be placed on Financial Aid Suspension.*

D. *Financial Aid Probation:*

In the event that a student fails to meet any of the above criteria (except for C-4) in a particular quarter, the student will be placed on Financial Aid Probation. A student in this category may receive financial aid for the upcoming quarter, but, must complete 12 credits with a quarterly GPA of 2.00.

If a student does not complete 12 credits with at least a 2.00 GPA that next quarter, the student is considered to be making "Unsatisfactory Progress" and is placed on Financial Aid Suspension. Financial Aid Suspension means the termination of all financial aid.

Once "Unsatisfactory Progress" has been determined, the student's recourse is:

E. *Appeal of Financial Aid Probation/Suspension:*

1. A student will indicate in writing (use Form CC-12-1256) to the Director of Financial Aid: (a) reasons why he/she did not achieve minimum academic requirements, and (b) reasons why his/her aid should not be terminated.

2. The Director of Financial Aid will review the appeal and determine whether the Financial Aid Probation/Suspension is justified. The student will be advised, in writing, of the decision.

3. A student wishing to appeal the decision of the Director of Financial Aid, may do so, in writing, to the Dean of Students.

F. *Conditions for Reinstatements:*

1. To be able to be reinstated a student must, on his/her own, complete 12 credits with a quarterly GPA of 2.00. At that time a student may reapply, in writing, for Financial Aid for the following quarter.

2. Incompletes that result in a student being placed on Financial Aid Probation/Suspension may be reviewed through the Appeal Process.

APPLICATION OF POLICY

Nancy is a single parent who is attending college part-time. She is taking evening courses and studying for an associate degree in radiology. She hopes to be a technician at a nearby hospital. Nancy takes 6-8 credits a quarter and has attended 4 quarters to date. In her fifth quarter, Nancy earns 6 credits but her GPA for that quarter falls to 1.5. Since this is below the 2.0 GPA requirement for satisfactory progress, Nancy is placed on financial aid probation. This means that as a half time student, Nancy has one semester in which she must regain the 2.0 minimum.

In her next semester Nancy registers for 6 credits, receives financial aid, and does very well academically. She is able to maintain the 2.0 GPA minimum and to continue in her program.

* * * *

Judy registers for 12 credits in the third quarter of her program. Until now she has done well. Now however she receives "incomplete" grades for all of her courses. She failed to submit required papers and did not attend exams.

Judy is placed immediately on financial aid suspension. All financial aid is terminated and if Judy is to be considered eligible again she must follow the appeal procedure and convince the Director of Financial Aid and/or the Dean of Students that she deserves a second chance.

CASE FOUR

The following policy illustrates the concept of requiring students to meet a progressively more demanding grade point average as well as pass minimum credits per semester.

The "one time" only waiver possibility accounts for most personal emergencies but would, through its total inflexibility, cause a student to lose funding in a legitimate, yet second occurrence of academic failure/withdrawal.

SAMPLE INSTITUTIONAL POLICY

The Federal Higher Education Amendments of 1976 require the university to define and enforce Standards for Satisfactory Academic Progress. Students receiving financial aid from federal, state or institutional sources must conform to the university's definition of satisfactory progress.

The guidelines are established to encourage students to successfully complete courses for which aid is received. Successful completion is defined as receiving one of the following grades: A, A+, B, B+, C, C+, D, D+, S.

Students who are advised to take 50% of their course work in remedial courses during their first or second semester at the university will not be subject to this formula.

Courses transferred from other institutions during the period of matriculation at the university will be included in the number of semester hours earned.

Students who are not successfully completing courses at the minimum levels as outlined on the following chart are considered to be making unsatisfactory progress.

Students may not receive financial aid until they have regained satisfactory progress status. Failure to regain satisfactory progress status will result in the loss of all federal, state, and university aid, including grants, scholarships, loans and employment.

STANDARDS OF SATISFACTORY ACADEMIC PROGRESS—FULL TIME UNDERGRADUATES

CALENDAR: SEMESTER

PROGRAM: BACCALAUREATE DEGREE

AT THE COMPLETION OF THIS FULL-TIME SEMESTER	1	2	3	4	5	6	7	8	9	10
A STUDENT MUST HAVE ACCRUED AT LEAST THIS MANY CREDITS	6	18	30	42	54	66	78	90	105	120
WITH AT LEAST THIS GRADE POINT AVERAGE	1.25	1.25	1.5	1.5	1.75	1.75	1.75	1.85	1.9	2.0

IN ORDER TO BE MAKING SATISFACTORY PROGRESS

APPLICATION OF POLICY

In order to receive financial aid, John must meet certain minimum standards that are clearly spelled out. In his first semester, John has to earn at least 6 credits and have a GPA of 1.25 (on a scale with 4.0 as the highest, a 1.25 works out to be slightly higher than a "D" grade). The combination of credits earned and GPA sets a progressive standard so that in order to graduate John must have earned 120 credits and maintained at least a 2.0 GPA. For John, sticking to this minimum is no problem and he graduates on schedule earning 130 credits with a GPA of 3.0.

* * * *

Sally, on the other hand, encounters difficulty by her junior year. She has just kept to the minimum since she began and finds herself at the end of her junior year with sufficient credits (70) but with a GPA of 1.5. She is required to have a GPA of 1.75 to be eligible for financial aid next year. Sally takes advantage of the "one time" waiver offered to her. She realizes this is her only chance and that she has one semester to raise her GPA and to continue to accumulate the credits she needs to stay on schedule. If Sally fails to do so, she will be unable to receive further financial aid.

CASE FIVE

The following is a very brief but clear policy in use at a proprietary institution. Students are given a 6 week probationary term during which grades must be sufficiently improved. Failing this, the student will not be financially covered for that 6 week period. The institution obviously has the capability of frequent evaluation and monitoring of instructees' academic progress. Though aid is retroactively reissued, students are made adequately aware of the possibility in a timely fashion.

SAMPLE INSTITUTIONAL POLICY

ATTENTION ALL STUDENTS

STANDARDS OF PROGRESS

EFFECTIVE OCTOBER 22, 1982, THE STANDARDS OF ACADEMIC PROGRESS FOR THIS INSTITUTION ARE AS FOLLOWS:

"All grades are given in percentage, 65% is the lowest passing grade. To achieve satisfactory progress, a student must maintain a combined average of at least 70% (1.5) for all subjects. Students whose grades fall below this standard may be permitted to continue into the next quarter on a 'conditional' basis only. To remove this condition a review of progress will be made after this student has completed six weeks of the quarter. If he or she has not raised his/her average to 70% (1.5), his V.A. benefits will be terminated and no Financial Aid will be issued for that quarter. The student is also subject to dismissal. Tuition for the quarter remains the personal responsibility of the student."

All grades are given in percentage, 65% is the lower grade permitted. A student not averaging 65% in any subject may either be placed on probation or required to repeat the subject. If he continues to receive failing grades, he will be dismissed from the institution without prejudice.

The percentage system is fairer to the student since he can readily see his/her progress. For comparison:

Letter grade A - 93-100; B - 85-92; C - 75-84; D - 65-74.

APPLICATION OF POLICY

Joe is receiving financial aid and VA benefits while studying to be a mechanic. In his first quarter he passes all his courses, but just barely. His average is 65% and he needs to achieve a 70% level in order to be making satisfactory progress. Joe is permitted to continue into the next quarter on a "continual basis." Six weeks into the quarter, Joe's grades will be reviewed. If he hasn't at this point been able to raise his average to 70%, he loses all financial aid and VA benefits for that quarter. Joe is then responsible for paying tuition on his own, and is subject to dismissal from the school. Joe can continue to enroll, but he will not receive financial aid until his grade point average is brought up to the 70% minimum.

CASE SIX

The following policy statement is noteworthy for its specific requirements for students transferring into the institution having previously made unsatisfactory progress at another school.

SAMPLE INSTITUTIONAL POLICY

SATISFACTORY ACADEMIC PROGRESS AGREEMENT FOR FINANCIAL AID RECIPIENTS

FEDERAL AND STATE REGULATIONS REQUIRE THAT STUDENTS RECEIVING FINANCIAL AID MUST MAINTAIN SATISFACTORY ACADEMIC PROGRESS. AT THIS COMMUNITY COLLEGE, SATISFACTORY ACADEMIC PROGRESS PROCEDURES FOR STUDENTS WHO HAVE RECEIVED ASSISTANCE FROM THE FINANCIAL SERVICES AND PLACEMENT OFFICE ARE AS FOLLOWS:

Any student who has been denied Financial Aid at another postsecondary institution because of the lack of satisfactory academic progress or a default on a student loan will be denied aid at this school until that student has satisfactorily completed twelve (12) credit hours on his/her own and/or cleared up the default situation.

1. *Financial Aid recipients must register for and complete a minimum of twelve (12) credits each quarter. Letter grades of F, I, N, W, and Y do not count toward completed credits.*

2. *At the end of the FIRST quarter:*

   a. *Any student completing less than twelve (12) credits and more than five (5) credits will be placed on Financial Aid Probation. The Financial Aid Probation Form will be mailed to the student. It must be signed and returned to the Financial Services and Placement Office before additional Financial Aid will be released.*

   b. *Any student completing less than six (6) credits will be denied additional Financial Aid for the next quarter. The student must file a Petition for Reinstatement for Financial Aid.*

3. *At the end of the SECOND quarter on Financial Aid all students must have completed eighteen (18) cumulative credits or their Financial Aid will be terminated. The student must file a Petition for Reinstatement for Financial Aid.*

4. *For all succeeding quarters (beyond the first two quarters) the aid recipient must complete twelve (12) credits or be terminated from his/her Financial Aid. Upon termination the student must file a Petition for Reinstatement.*

5. *Academic suspension from the college will result in automatic termination of your Financial Aid.*

I HAVE READ AND AGREE TO COMPLY WITH THE TERMS OF THESE ACADEMIC REQUIREMENTS FOR PARTICIPATION IN THE FINANCIAL AID PROGRAMS AT THIS COMMUNITY COLLEGE.

_____ _____

DATE *STUDENT SIGNATURE*

_____

STUDENT NUMBER

APPLICATION OF POLICY

Frank did very poorly at the first college he enrolled in. In fact, he had to leave school when he lost his financial aid due to his failure to meet the satisfactory academic progress standards of the institution. Frank is required to submit a financial aid transcript to his new school as part of his application for admission and financial aid. In reviewing the transcript it is learned that he had failed to make satisfactory progress at his earlier school. Since this was the case, Frank is denied aid at his new school until he has completed 12 credits. In other words, he is permitted to enroll, but financial aid will not be provided until he has demonstrated that he can perform.

Frank is able to register and pay for his courses. Having learned his lesson, he works hard and does well. He earns 12 credits and is now eligible to receive

financial aid. He applies for aid, receives it, and registers for the minimum 12 units required.

At the end of his first quarter, Frank completes 7 of the 12 credits he registered for and is placed on financial aid probation. Frank receives aid in his second quarter, but he must complete by the end of this quarter 18 cumulative credits in order to continue. He registers for 12, completes 12, and thus has 19 credits and is eligible for further aid.

For here on, Frank must earn at least 12 credits per quarter. Failure to do so will result in termination of financial aid.

STANDARDS OF SATISFACTORY ACADEMIC PROGRESS TO MAINTAIN FINANCIAL AID ELIGIBILITY

A. Each institution should take all necessary steps to fulfill the federal requirement to implement and make public the standards for satisfactory academic progress that students must meet to be eligible to receive federal financial aid.

The statement of institutional policy on satisfactory academic progress for purposes of continued aid eligibility should be available to all requesting it and should be made public through readily available institutional publications. Each federal financial aid recipient should be provided with a copy of the institutional statement of satisfactory academic progress.

B. In establishing standards of satisfactory academic progress, each institution should respond to the diversity of its students and academic programs. Within a given category and program, such standards should be applied consistently to all students receiving federal financial aid.

Each institution should establish standards in accordance with the diversity of its students, for instance, to recognize differences in educational objective and between full-time and part-time status. Once established, such standards should be uniformly applied to all students receiving federal financial aid within a given category. For example, all full-time students in a given institution and program should be expected to maintain the same minimum academic progress.

C. Each institution should establish and announce a reasonable length of time for students receiving federal financial aid to complete their educational objectives. This time should be consistent with the academic goal of the student and would vary according to enrollment status. The institution's policy on standards of academic progress should include a statement of the effect on academic progress and financial aid eligibility of course incompletion, course withdrawal, course repetition, and noncredit remedial courses.

Institutions should establish limits on the amount of time allowed for students in different enrollment categories (e.g., full-time, half-time) to complete their objectives to be eligible to receive federal financial aid. The time established should include any additional time needed to complete noncredit remedial courses. The institution's policy should clearly describe the effect on satisfactory progress of course incompletion, course withdrawals, and course repetition. A given institution may decide to impose a limit on the number of course incompletions, course withdrawals, and course repetitions. Clock-hour institutions should establish a maximum number of clock hours of instruction for students to complete their programs.

D. Procedures for appeal and reinstatement of aid should be part of each institution's policy on satisfactory progress and should be readily available in writing to all students receiving federal financial aid. When an institution denies aid, reviews a case, or reinstates a student who was previously considered not to be making satisfactory progress, documentation to justify the action must be maintained.

Institutional policy should clearly describe the procedures for appeal and reinstatement, possibly including the conditions under which an appeal may be sought and the procedures by which students may satisfy the deficiencies that led to ineligibility.

E. Evaluation of a student's academic standing and progress to determine federal financial aid eligibility should be made before each award period, but no less often than once per year.

Although some institutions are able to make a formal evaluation of a student's progress after each academic term, many other institutions, due to processing and time constraints, are not able to do so. If an institution can complete formal evaluations only once per year, an effort should be made to conduct more frequent evaluation/monitoring during the year. This will be particularly important in situations involving a probation/warning status or with appeals and reinstatement.

SATISFACTORY ACADEMIC PROGRESS POLICY CHECKLIST

The following questions are intended to assist you in developing and evaluating your satisfactory academic progress policy. You are encouraged to review your institution's current policy and/or procedures using this checklist. Whereas some of these aspects are extremely important in certain types of institutions, they may be totally irrelevant in others. Therefore, the answers will vary from one institution to another.

1. Are the appropriate institutional administrators, faculty and students involved in the development and evaluation of the policy? YES___ NO___

2. Is the policy written in a manner which is clearly understood by students? YES___ NO___

3. Is the policy published in appropriate institutional literature? YES___ NO___

4. Is the policy distributed to all financial aid recipients? YES___ NO___

5. Are faculty advisors, counselors and other institutional personnel involved directly with students aware of the policy? YES___ NO___

6. Are the following considered in determining satisfactory academic progress?
   - Course withdrawals YES___ NO___
   - Incomplete grades YES___ NO___
   - Repeated courses YES___ NO___
   - Non-punitive grades YES___ NO___

7. Is the policy evaluated periodically to ensure its continued appropriateness? YES___ NO___

8. Are the same standards applied to eligibility for institutional and federal student aid funds? YES___ NO___

9. Are transfer credits counted in determining progress? YES___ NO___

10. Is the policy modified accordingly for students who attend on a less than full-time basis? YES___ NO___

11. Does the policy require movement toward graduation or program completion at a reasonable rate? YES___ NO___

12. Does the policy include a maximum number of terms, years, or credit hours during which a student may receive aid? YES___ NO___

RESOURCES

Legislative Background

Requiring students to maintain good standing in their particular course of study as a condition of receiving federal student aid is a concept that has been advanced since the programs began. The Education Amendments of 1976 (P.L. 94-482) for the first time consolidated the definition for all Title IV programs and required that institutions limit federal financial aid to those students who, according to institutional standards, were in good standing and maintaining satisfactory progress in their particular course of study. A 1978 study of the management of federal financial aid programs by the General Accounting Office took serious exception to the paucity of such standards and noted significant evidence of institutional nonadherence even when standards did exist.

Senator Claiborne Pell, then Chairman of the Subcommittee on Education, Arts and the Humanities, held Congressional hearings on the subject of satisfactory academic progress standards during the development of the Education Amendments of 1980 (P.L. 96-374). The resulting Senate amendments excluded from the definition of students who are maintaining satisfactory progress those students who, while receiving Title IV assistance, failed to successfully complete at least three-fourths of the academic workload undertaken with such assistance, until such work or the equivalent was completed successfully. The mandate did, however, contain a caveat allowing institutions to exempt students from this requirement if it was determined that exceptional circumstances did exist and failure to waive the requirement would result in undue hardship to the students.

The Senate Committee Report (96-733) which accompanied their version of the bill further specified that they did not "....intend in any way to intrude into institutional decisions as to what constitutes successful completion of a course." The Committee Report clearly stated "...that such decisions are institutional decisions and should remain so."

The Conference Committee on the disagreeing votes of the House and Senate to amend and extend the Higher Education Act of 1965 agreed to recommend that the issue of satisfactory progress be studied by the National Commission on Student Financial Assistance and reported to the Congress within one year of the Commission's establishment.

Legislative History

Public Law 94-482, The Education Amendments of 1976
Public Law 96-374, The Education Amendments of 1980
House Reports 96-520, Committee on Education and Labor
96-1337, House/Senate Conference Committee
Senate Report 96-733, Committee on Labor and Human Resources

Reference Sources

United States General Accounting Office; Report to the Congress, "Inconsistencies in Awarding Financial Aid to Students Under Four Federal Programs." Washington, D.C., May 11, 1979.

United States General Accounting Office; Report to the Chairman, Committee on Labor and Human Resources, United States Senate; "Students Receiving Federal Aid Are Not Making Satisfactory Academic Progress: Tougher Standards Are Needed;" Washington, D.C., December 3, 1981.

II

97TH CONGRESS
2D SESSION

S. 2822

To amend title IV of the Higher Education Act of 1965 to provide standards for students for maintaining satisfactory progress as a condition for assistance under that title.

IN THE SENATE OF THE UNITED STATES

AUGUST 10 (legislative day, JULY 12), 1982

Mr. NICKLES (for himself and Mr. PELL) introduced the following bill; which was read twice and referred to the Committee on Labor and Human Resources

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A BILL

To amend title IV of the Higher Education Act of 1965 to provide standards for students for maintaining satisfactory progress as a condition for assistance under that title.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That this Act may be cited as the "Student Assistance Reform Act".

SEC. 2. (a) Section 484(a)(3) of the Higher Education Act of 1965 is amended by striking out "according to the standards and practices of the institution at which the student is in attendance" and inserting in lieu thereof the following:

ods, the student may, subject to this subsection, again be eligible under such clause (3) for a grant, loan, or work assistance under this title, except that no such student may be placed on probation as described in the second sentence of paragraph (1).

"(3) Any institution of higher education at which the student is in attendance may, for the purpose of clause (3), waive the provisions of paragraph (1) or paragraph (2) of this subsection for undue hardship based on—

"(A) the death of a relative of the student,

"(B) the personal injury or illness of the student, or

"(C) special circumstances as determined by the institution.".

SEC. 3. The amendments made by this Act shall take effect for the first academic year, or its equivalent, as determined by the Secretary of Education, beginning after the date of enactment of this Act.

O

APPENDIX D

QUESTIONNAIRE:

SATISFACTORY ACADEMIC PROGRESS

[Published in NASFAA Newsletter, November 3, 1982]

1. Has your institution developed and implemented standards of satisfactory progress for financial aid recipients? Yes_____ No_____

2. Please attach copies of the satisfactory progress standards maintained by your institution for both financial aid recipients and the general student body. If you wish, you may delete mention of the name of your institution from these.

   2-a. In which campus publications are the progress standards explained?

Financial aid standards	Campus standards
_____	_____
_____	_____

3. When did your institution first implement progress standards for financial recipients? _____/_____ (Month / Year)

   When did you last review or revise these standards? _____/_____ (Month / Year)

4. Are there plans to modify the aid recipient progress standards on your campus?
   Yes_____ No_____

   4.a IF YES, when will the new standards be implemented?
   - This academic year..._____
   - Next academic year..._____
   - Later..._____

5. Have you used the NASFAA Monograph, Standards of Satisfactory Academic Progress to Maintain Financial Aid Eligibility (adopted by the higher education community) and/or proposed federal regulations as the basis for modifying or evaluating your progress standards? (Check all that apply.)

   NASFAA Monograph.....Yes_____ No_____
   Community Standards.....Yes_____ No_____
   Federal Regulations.....Yes_____ No_____
   Other (Please specify)_____

6. Please indicate the academic terms used by your institution.

Semester..._____	Trimester..._____
Quarter..._____	One Year Training Program._____
Nine Month Training Program_____	Six Month Training Program_____
Other (Please Specify)....._____	

7. How often during the academic year does your institution verify the academic standing/progress financial aid recipients?...._____

8. Please indicate the number of financial aid recipients who have been terminated or placed probation by the institution due to failure to meet progress standards.

	TERMINATION	PROBATION
Academic year 1981-82	_____	_____
Academic year 1982-83	_____	_____

9. Some institutions require different progress standards for various categories of student... general, are financial aid recipients at your institution expected to maintain identical... demanding or less demanding standards as those required for the general student body?

Identical standards	yes_____	no_____
More demanding standards	yes_____	no_____
Less demanding standards	yes_____	no_____

10. Compared to your present standard, what would be the probable effect of implementing a st... requiring a "C" grade point average or the equavilent for receipt of financial assistance?

More students would lose their aid eligibility..._____
Fewer students would lose their aid eligibility.._____
The same number of students would lose their aid eligibility....._____

11. Do your progress standards for aid recipients differ for various categories of studs...
Yes_____ No _____

If YES, Check all of the student categories for which specific standards have been devel...

Freshmen....._____	Sophomores...._____	Juniors....._____	Seniors....._____
Graduate level_____	Most Needy...._____	Academically Disadvantaged....._____	
Federal Aid Recipients only....._____		Other (Please Specify)....._____	
State Aid recipients only....._____		Other (Please Specify)....._____	
Institutional Aid recipients only....._____			

12. Is there an appeals process on your campus for students who lose their aid eligibility ... failure to meet progress standards?...Yes_____No_____

If YES, indicate the campus entity that has the final determination in the appeals proce... (If this is a committee, please list the titles of the members).

_____
_____

13. Does your institution have a process through which a student, whose financial aid ha... terminated for failure to maintain progress standards, is made aware of reinsta... procedures?...Yes_____No____

14. Please indicate the size of the full and part-time student population on your campus as ... the number of full and part-time aid recipients on your campus.

Full-time enrollment.._____	Part-time enrollment.._____
Full-time recipients.._____	Part-time recipients.._____

15. Please indicate the type and control of your institution.

Four-Year Public...._____	Four Year Private...._____
Two Year Public....._____	Two Year Private....._____
Proprietary....._____	

PLEASE ATTACH ANY ADDITIONAL INFORMATION OR COMMENTS YOU FEEL WOULD PROVIDE A MORE COMPRE... UNDERSTANDING OF YOUR INSTITUTION'S STANDARDS.

RETURN THIS QUESTIONNAIRE AND ACCOMPANYING DOCUMENTATION BY NOVEMBER 24 TO:

NASFAA
1776 Massachusetts Avenue, NW
Suite 100
Washington, DC 20036
ATTN: Joan Holland